NBC Universal Evolution Plan
ENV-2007-0254-EIR
STATE CLEARINGHOUSE NO. 2007071036
Council District 4

THIS DOCUMENT COMPRIS ES THE SECOND AND FINAL PART OF THE ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE PROJECT DESCRIBED. THE DRAFT EIR (VOLUMES 1 THROUGH 27) WHICH WAS PREVIOUSLY CIRCULATED FOR PUBLIC REVIEW AND COMMENT, COMPRIS ES THE FIRST PART.

Project Address: 100 Universal City Plaza, Universal City, CA 91608

Project Description: Universal City Studios LLLP, L.P., proposes the NBC Universal Evolution Plan (the “Project”), which sets forth the framework to guide the development of an approximately 391-acre site located in the east San Fernando Valley near the north end of the Cahuenga Pass (the “Project Site”). The Project, as proposed, would involve a net increase of approximately 2.01 million square feet of new commercial development, which includes 500 hotel guest rooms and related hotel facilities. In addition, a total of 2,937 dwelling units would be developed. Implementation of the proposed Project would occur pursuant to the development standards set forth in two proposed Specific Plans. The proposed Universal City Specific Plan addresses development within the portion of the Project Site located within the City of Los Angeles, whereas the proposed Universal Studios Specific Plan addresses development within the portion of the Project Site located under the jurisdiction of the County of Los Angeles. Under the proposed Project, portions of the Project Site that are currently in the County of Los Angeles would be annexed into the City of Los Angeles, while other areas would be detached from the City of Los Angeles and returned to the jurisdiction of the County of Los Angeles. The proposed annexation/detachment reflects the Applicant’s objective to establish jurisdictional boundaries that follow existing and planned on-site land use patterns.

APPLICANT:
Universal City Studios LLLP, L.P.

PREPARED BY:
Environmental Review Section
Los Angeles City Planning Department

July 2012
III. Responses to Comments
(Continued)
III. Responses to Comments

D. Comment Letters and Responses

Comment Letter No. 1

Tom Labonge, Councilmember, 4th District
City Council of The City of Los Angeles
Room 480, City Hall
Los Angeles, CA  90012

[Note: A duplicate of the letter provided below was received on 11/5/10]

Comment No. 1-1

It is my understanding that the Draft Environmental Impact Report (DEIR) for the NBC Universal Evolution Plan report will be released today.

A large community in the 4th District may be impacted by this proposed project. A “Working Group/Communities United for Smart Growth” has already formed with members of Neighborhood Councils and Homeowner Associations, Because of the tremendous public interest in this project, I am requesting that the review period for the Draft EIR be extended from the required 45 days to a minimum of 90 days.

The distribution of this report is very important. I want to make sure the report is widely available and the public has ample time to review it.

Response to Comment No. 1-1

The comment requests that the Draft EIR comment period be extended from 45 days to 90 days. A public comment period for the Draft EIR was provided extending from November 4, 2010, to January 3, 2011, and was subsequently extended by the City Planning Department to February 4, 2011. This resulted in a 93-day written public comment period (November 4, 2010, through February 4, 2011), which substantially exceeds the 45-day minimum public review time period requirements set forth by the CEQA Guidelines (Section 15087(c)) and is consistent with that requested by the commenter. In addition, a public comment meeting was held on December 13, 2010. With regard to distribution, the Draft EIR public review period started with the City’s November 4, 2010 issuance of a Notice of Completion and Availability and submittal to the State Clearinghouse, Office of Planning and Research indicating the release of the Draft EIR for
Public review and comment. Public notices of the availability of the Draft EIR for review were provided in local newspapers, posted at the Project Site, as well as at local libraries and government offices, and mailed to property owners, in accordance with Section 15085 of the CEQA Guidelines. In addition, public notices were mailed to a large list of interested parties and government agencies. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment Letter No. 2

Tom Labonge, Councilmember, 4th District
City Council of The City of Los Angeles
Room 480, City Hall
Los Angeles, CA  90012

Comment No. 2-1

On Monday, December 13, 2010, the County of Los Angeles and the City of Los Angeles held a combined public comment meeting on the Draft EIR.

The meeting was well attended with over 400 people. Approximately 100 people testified. It was very clear to me that most people felt that the 90-day comment period was not sufficient time for review of the Draft EIR, inasmuch, as the Draft EIR came out during the Holiday season.

Reviewing this document is a massive undertaking and it is vital that the communities that will be impacted have the full opportunity to comprehend and comment on this issue. I request that an additional 30-day comment period be given to this review.

Response to Comment No. 2-1

The comment requests that the Draft EIR comment period be extended from 90 days to 120 days. Consistent with the requirements of CEQA, the Draft EIR was submitted to the State Clearinghouse, Office of Planning and Research, and was originally circulated for public review for a 61-day period, or 16 days more than the CEQA required 45-day review period. This 61-day comment period began on November 4, 2010, and ended on January 3, 2011. In response to requests to extend the review period, on November 18, 2010, the City of Los Angeles extended the comment period by an additional 32 days to February 4, 2011. Thus, the Draft EIR was circulated for a 93-day public review period, which is more than double the 45-day public review period required by CEQA Guidelines Section 15105 when a Draft EIR is submitted to the State Clearinghouse for review by state agencies. In addition, a public comment meeting was held on December 13, 2010. See also Topical Response No. 1: EIR Process (see Section III.C, Topical Responses, of this Final EIR)
Comment Letter No. 3

Jay Slater
Chairman
Los Angeles Bicycle Advisory Committee
211 S. Beverly Glen PH2
Los Angeles, CA  90025

[Note: A duplicate of the letter provided below was received, dated 2/3/11]

Comment No. 3-1

The City of Los Angeles Bicycle Advisory Committee (LABAC) submits the following comments regarding the Draft Environmental Impact Report (DIER) for the proposed NBC Universal Evolution project.

Response to Comment No. 3-1

The introductory comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft EIR are provided and responded to below.

Comment No. 3-2

With respect to the needs of bicyclists, the DEIR is deficient in the following respects:

1. The project must include a continuous Class I bicycle path along the LA River from Cahuenga/Lankersheim [sic] to Barham/Forest Lawn, and the DEIR must fully analyze the impacts of including (or not including) this path.

Response to Comment No. 3-2

With respect to the provision of a bicycle path along the Los Angeles River Flood Control Channel, as explained on pages 418–419 in Section IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft EIR, the northeastern portion of the Project Site that abuts the Los Angeles River Flood Control Channel is within the jurisdiction of the City of Los Angeles. The remaining approximately three-fourths of the northern edge of the Project Site is adjacent to River Road, a two-lane roadway that runs along the Los Angeles River Flood Control Channel. The majority of this northern edge is within the jurisdiction of the County, and the majority of the River Road roadway is owned by the Los Angeles County Flood Control District. As stated in the Draft EIR, the Applicant would cooperate with the County, City and other agencies as necessary to accommodate the future use of the County land for public use as contemplated by the County River Master Plan and to
continue use, if allowed by the County, of a portion of River Road for studio access. In addition, the Project includes a pedestrian/bicycle connection to CityWalk, as contemplated by the County River Master Plan. Further, in the northeastern portion of the Project Site that is within the City’s jurisdiction and owned by the Applicant, the Project proposes a River Trailhead Park that would provide access to the Los Angeles River Flood Control Channel, and connect the existing bike path along Forest Lawn Drive and the proposed bike path along the proposed North-South Road. If the County implements a public path on the County-owned portion of the Los Angeles River Flood Control Channel frontage, that path could be connected to the proposed River Trailhead Park and the internal bike path along the North-South Road. The proposed Project furthers the goals and objectives of the County River Master Plan and City River Revitalization Master Plan and would not preclude the implementation of a bicycle path along the Los Angeles River Flood Control Channel as contemplated in those plans.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 3-3

2. The proposed North-South Road and bikeway are not an adequate substitute for current bicycle access along Barham Boulevard, and the DEIR must fully analyze the impacts for bicyclists of the proposed reconfiguration of Barham.

Response to Comment No. 3-3

Contrary to the suggestion in the comment, the Project’s proposed on-site bicycle network is not intended to substitute or serve as a replacement for bicycle access along Barham Boulevard. Currently, there is no bicycle lane on Barham Boulevard. The Project is proposing a bicycle network on the Project Site to encourage bicycle travel for its employees, residents, and the public. As discussed on pages 652–653 in Section IV.B.1, Traffic/Access-Traffic/Circulation, of the Draft EIR, the Project would introduce new bike lanes along the proposed North-South Road, various smaller roadways within the Mixed-Use Residential Area, and the realigned Universal Hollywood Drive passing south of Universal CityWalk. As set forth in the Project’s proposed Streetscape Plan, Appendix A-4 to the proposed City Specific Plan (see Appendix A-1 of the Draft EIR), the Project’s streetscape design incorporates Class II bicycle lanes on both sides of Lakeside Plaza Drive which connect to the Class II bicycle lanes on the proposed North-South Road. An off-street Class I bicycle path would connect the southerly end of the North-South Road to the Class II bicycle lanes along Universal Hollywood Drive through to Lankershim Boulevard, also with a connection to CityWalk. Connecting to this system of Class I and Class II bicycle facilities would be additional Class II bicycle lanes along the various smaller roadways proposed within the Mixed-Use Residential Area. As stated on page 653 in
Section IV.B.1, Traffic/Access-Traffic/Circulation, of the Draft EIR, the Project’s proposed bike path configuration would be subject to the review and approval of the City Bureau of Engineering, Los Angeles Department of Transportation, and County of Los Angeles Department of Public Works for the portions of the bicycle facilities within their respective jurisdiction.

With regard to impacts from the reconfiguration of Barham Boulevard, the proposed Project mitigation measure for Barham Boulevard as described in Mitigation Measure B-5 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, mitigates the Project’s traffic impacts while alleviating traffic congestion along the Barham Boulevard corridor. Field surveys conducted along the Barham Boulevard corridor, see Appendix FEIR-4 of the Final EIR, show that fewer than 12 bicyclists travel along Barham Boulevard (south of Forest Lawn Drive) during either the A.M. or P.M. peak hour, as compared to 4,500 automobiles on Barham Boulevard during the peak hour.

The City’s 2010 Bicycle Plan was adopted in March 2011, after the release of the Draft EIR for the Project. Barham Boulevard is shown as part of the Backbone Bikeway Network on the City’s 2010 Bicycle Plan. The City’s 2010 Bicycle Plan includes a proposed future bicycle lane on Barham Boulevard from Forest Lawn Drive to Cahuenga Boulevard. The City’s 2010 Bicycle Plan acknowledges that many future bicycle lanes will require additional analysis particularly with regard to impacts on traffic. “As each bikeway that is identified as a future bicycle lane is prioritized in the Five-Year Implementation Strategy a preliminary analysis will be conducted to evaluate whether further environmental review will be necessary…. In some cases the analysis may determine that the originally selected roadway is not well-suited for a bicycle lane. In these cases an alternative roadway within the same general corridor may be considered or alternative solutions may be considered that would facilitate bicycle activity on the designated corridor without the inclusion of a bicycle lane.” (See Chapter 5, page 115 of the City’s 2010 Bicycle Plan.)

As acknowledged by the 2010 Bicycle Plan, implementation of the Bicycle Plan may require the decision-makers to prioritize varying Transportation Element policies. For example, the proposed bike lane on Barham Boulevard may require removal of existing travel lanes to accommodate the new bike lanes; i.e., the proposed bike lanes cannot be accommodated within existing right-of-way even in the absence of the Project’s transportation mitigation measures. Such roadway configuration changes on streets with high automobile traffic volumes would result in a significant impact on vehicular mode of travel.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment No. 3-4

3. The proposal ignores the fact that streets at or near the project, including Barham Boulevard, Cahuenga Boulevard, Lankersheim Boulevard and Ventura Boulevard, are part of the Backbone Bikeway Network in the soon-to-be-adopted Bicycle Plan, and the DEIR must fully analyze the project’s potential impacts on implementation of the new Bicycle Plan and evaluate whether the Bicycle Plan’s proposed improvements for these streets should be implemented as part of this project.

Response to Comment No. 3-4

Contrary to the statement in the comment, the Draft EIR does discuss the City of Los Angeles Bicycle Plan. The Draft EIR notes that at the time of preparation of the Draft EIR the City was updating the existing Bicycle Plan, which is part of the Transportation Element. As discussed on pages 512–516 in Section IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft EIR, the Project would not be inconsistent with the policies of the City of Los Angeles General Plan Transportation Element.

As discussed in Response to Comment No. 3-3, above, the City’s 2010 Bicycle Plan was adopted in March 2011, after the release of the Draft EIR for the Project. The City’s 2010 Bicycle Plan is an update to the Bicycle Plan adopted by the City in 1996 and re-adopted in 2002 and 2007. As stated in the City’s 2010 Bicycle Plan, “[i]t establishes long-range goals, objectives and policies at a citywide level and contains a broad range of programs that constitute the steps the City intends to take in order to become a more bicycle-friendly Los Angeles.” The Backbone Bikeway Network is one of three designated bicycle networks and concentrates on providing an interconnected system of streets that facilitates 24/7 bicyclist mobility on key arterials. It is planned to comprise 719 miles, primarily of bike lanes (Class II). The City’s Bicycle Plan also states that it is expected that the Backbone Bicycle Network will initially be used primarily by experienced riders who are comfortable riding close to moderate to heavy traffic volumes.

The comment addresses the implementation of the Project relative to the provisions of the City’s 2010 Bicycle Plan, which is a part of the Transportation Element of the City’s General Plan. The Transportation Element addresses all forms of mobility and circulation within the City, including vehicles on roadways, public transit and bicycles. The varying goals and policies in the Transportation Element and the General Plan necessitate that the decision-makers consider which goals and policies should be prioritized. The proposed transportation mitigation measures generally would not prevent the implementation of the City’s Bicycle Plan, but may require the decision-makers to prioritize varying Transportation Element policies applicable to the Project. For example, the proposed bike lanes on Lankershim Boulevard and Barham Boulevard may require removal of existing travel lanes on these streets to accommodate the new bike lanes; i.e., the proposed bike lanes cannot
be accommodated within existing right-of-way even in the absence of the Project’s transportation mitigation measures. Such roadway configuration changes on streets with high automobile traffic volumes would result in a significant impact on vehicular mode of travel.

In Chapter 5, Implementation, of the 2010 Bicycle Plan, the plan acknowledges that only some proposed bicycle lanes were evaluated in the Mitigated Negative Declaration that was conducted simultaneously with preparation of the 2010 Bicycle Plan and that “many future Bicycle lanes will require additional analysis (particularly impacts on traffic) pursuant to the California Environmental Quality Act (CEQA).” “As each bikeway that is identified as a future bicycle lane is prioritized in the Five-Year Implementation Strategy a preliminary analysis will be conducted to evaluate whether further environmental review will be necessary…. In some cases the analysis may determine that the originally selected roadway is not well suited for a bicycle lane. In these cases an alternative roadway within the same general corridor may be considered or alternative solutions may be considered that would facilitate bicycle activity on the designated corridor without the inclusion of a bicycle lane.” (City of Los Angeles 2010 Bicycle Plan, pages 114–115.)

The Project is proposing a bicycle network on the Project Site to encourage bicycle travel for its employees, residents, and the public. As discussed on pages 652–653 of the Draft EIR, the Project would introduce new bike lanes along the North-South Road, various smaller roadways within the Mixed-Use Residential Area, and the realigned Universal Hollywood Drive passing south of Universal CityWalk. The Project also includes project design features and transit improvements that would reduce vehicle trips and encourage bicycling. For example, as described on page 661 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, the Project would develop and implement a Transportation Demand Management Program to encourage non-automobile travel that may include bicycle and pedestrian-friendly environment (i.e., established and clear pedestrian networks, intersections, and built environments) and bicycle amenities, among other features.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 3-5**

First, the project must include a continuous Class I bicycle path adjacent to the Los Angeles River through the entire project from Lankersheim/Cahuenga [sic] to Barham. As currently configured, the project would require bicyclists to leave a protected Class I bike path and travel on along surface streets at and around the Universal City Red Line station and entrances to Universal Studios’ Citywalk [sic], theme park and studio tour. As opposed to a level riverside bike path, the proposed route involved considerable elevation changes.
A continuous bike path along the LA River is an important aspect of the long-term Los Angeles River revitalization plan, and eventually will provide critical bicycle access between Downtown Los Angeles and the San Fernando Valley that avoids the grade changes and vehicular conflicts of the Cahuenga Pass. This is important to promote bicycle commuting.

In addition, Class I bicycle paths provide safe recreational spaces for less-skilled bicyclists, including children. The proposed configuration would result in an LA River bike path that is unsafe as a recreational facility for children and other less skilled bicyclists. The Draft EIR fails to adequately discuss or consider the adverse impacts of a non-continuous LA River Class I bike path, or evaluate the costs and benefits of a continuous LA River Class I bike path.

**Response to Comment No. 3-5**

The Project does not preclude the implementation of a bicycle path along the Los Angeles River Flood Control Channel as contemplated in the City and County plans. The commenter is referred to Response to Comment Nos. 3-2 and 3-3, above, regarding the bike path along the Los Angeles River Flood Control Channel and the proposed on-site bicycle lanes.

The County of Los Angeles 2011 Bicycle Master Plan (“2011 County Bicycle Plan”) was adopted by the County Board of Supervisors on March 13, 2012. The 2011 County Bicycle Plan is an update to the 1975 County Bikeway Plan and is a sub-element of the Transportation Element of the Los Angeles County General Plan. The 2011 County Bicycle Plan is intended to guide the development and maintenance of a comprehensive bicycle network and set of programs throughout the unincorporated communities of the County of Los Angeles for 20 years (2012 to 2032). It proposes to build on the existing 144 miles of bikeways throughout the County, and install approximately 832 miles of new bikeways in the next 20 years.

With respect to Universal City, the 2011 County Bicycle Plan proposes a 1.0 mile long Class I bicycle path along the Los Angeles River from Lankershim Boulevard to 0.2 mile west of Barham Boulevard. In addition, page 122 of the 2011 County 2011 Bicycle Plan states, “Universal City consists of hilly private land and streets, except for access roads that connect visitors to the Universal Studios Theme Park and Universal City Walk. Although the community has no residents, the area is a major employee and tourist destination. Shuttles transport workers and visitors between the area and the nearby Universal City Red Line Metro Station. Due to topographical barriers and the relative absence of major bicycle trip generators, improvements are focused on facilitating connections to bicycle networks and transit hubs in adjacent cities.” The 2011 County Bicycle Master Plan was not drafted or adopted at the time of circulation of the Draft EIR for
NBC Universal Evolution Plan Project. However, the Draft EIR discusses bicycle facilities in connection with the County River Master Plan (e.g., page 418 of the Draft EIR).

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 3-6**

Second, the Draft EIR proposes a reconfiguration of Barham Boulevard that would negatively impact bicyclists, and this impact is neither discussed nor evaluated in the Draft EIR. Barham Boulevard currently provides bicycle access between Hollywood and the rest of the LA Basin to Burbank, Griffith Park and other destinations. It is an important route for utilitarian/commuter and recreational bicyclists. In addition, the Bicycle Plan recently approved by the Los Angeles City Planning Commission (and soon to be adopted by the Los Angeles City Council) designates the 1.1 miles of Barham Boulevard between Forest Lawn and Cahuenga for future Class II bike lanes. Currently, bicyclists travelling south on the wide curb lanes on Barham toward Hollywood have a direct route; they cross the Hollywood Freeway on Barham and turn left on Cahuenga.

The proposed reconfiguration of Barham would reduce the width of the curb lane, making the street more dangerous for bicyclists. The proposed “North-South Street” is not an adequate alternative. Because the project does not propose a bridge across the Hollywood Freeway, bicyclists would be forced to travel south to the Universal Studios Boulevard bridge, cross the freeway and then travel uphill on Cahuenga Boulevard. This route is both much longer - approximately 1.6 miles instead of 1.1 miles - and requires bicyclists to negotiate far greater total hill climbs than the existing Barham route. The Draft EIR provides no information about the topography of the project’s proposed circuitous routing for bicyclists, or comparisons of travel time for bicyclists.

**Response to Comment No. 3-6**

The commenter is referred to Response to Comment Nos. 3-3 and 3-4, above, regarding Barham Boulevard, the City’s 2010 Bicycle Plan and the proposed on-site bicycle network. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 3-7**

The Draft EIR fails to include or analyze any alternatives that preserve or enhance direct travel for bicyclists along Barham Boulevard.
Response to Comment No. 3-7

The commenter is referred to Response to Comment Nos. 3-3 and 3-4, above, regarding Barham Boulevard. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 3-8

Third, while the proposed NBC Universal Evolution project includes provisions for internal bicycle circulation, the Draft EIR does not acknowledge the fact that the streets surrounding the project are part of a citywide bicycle network. The traffic study considers vehicular circulation throughout the region surrounding the project, but completely ignores bicycle circulation. Specifically, the Los Angeles Bicycle Plan recently approved by the Los Angeles City Planning Commission (and soon to be adopted by the Los Angeles City Council) designates Barham Boulevard, Cahuenga Boulevard, Lankersheim [sic] Boulevard, and Ventura Boulevard in the immediate vicinity of the project as part of the “Backbone Bikeway Network.”

Response to Comment No. 3-8

The traffic analysis presented in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR and the Transportation Study for the NBC Universal Evolution Plan Environmental Impact Report (Gibson Transportation Consulting, Inc. and Raju Associates, Inc., March 2010) (the “Transportation Study”) is based on the latest guidelines adopted by the Los Angeles Department of Transportation (LADOT) (Traffic Study Policies and Procedures and the Los Angeles CEQA Thresholds Guide: Your Resource for Preparing CEQA Analyses in Los Angeles [City of Los Angeles, 2006]). Therefore the Project’s traffic impact analysis is consistent with the City’s adopted methodologies and consistent with those used for other developments in the City of Los Angeles. The City of Los Angeles’ traffic impact methodology is similar to most jurisdictions adjacent to Los Angeles. For example, the Cities of West Hollywood and Burbank use the “Critical Movement Analysis—Planning” methodology, similar to LADOT, and the County of Los Angeles uses the Intersection Capacity Utilization methodology which uses the same capacity calculation analyses as the “Critical Movement Analysis—Planning” methodology employed by LADOT. Note that the traffic analysis discusses bicycle facilities on pages 652–653 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR.

With regard to the City’s Bicycle Plan, the commenter is referred to Response to Comment Nos. 3-3 and 3-4, above. With regard to the County’s recently adopted Bicycle Plan, the commenter is referred to Response to Comment No. 3-5.
The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 3-9**

Just as the Draft EIR contains extensive discussions about vehicular traffic impacts and potential roadway improvements for motorized vehicles through the Cahuenga Pass, the environmental review must analyze and propose bicycle improvements through the Cahuenga Pass.

**Response to Comment No. 3-9**

As stated in Response to Comment No. 3-8, above, the Project’s traffic impact analysis is consistent with the lead agency’s adopted methodologies and consistent with those used for other developments in the City of Los Angeles.

The Project’s proposed mitigation measures for Cahuenga Boulevard include the new local shuttle system (as described in Mitigation Measure B-2) and signal controller upgrades and closed-circuit television cameras as described in Section IV.B.1.5.m, Traffic/Access – Traffic/Circulation, of the Draft EIR. As shown in Tables 39 and 40 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR and Table 25 of the Transportation Study, these mitigation measures fully mitigate the Project’s impact to less than significant at the analyzed intersections on this section of Cahuenga Boulevard. It should also be noted that field surveys show that fewer than 12 bicyclists travel along Barham Boulevard (south of Forest Lawn Drive) and fewer than four bicyclists travel along Cahuenga Boulevard (West) (east of Barham Boulevard) during either the A.M. or P.M. peak hour, as compared to 4,500 automobiles on Barham Boulevard and 3,100 automobiles on Cahuenga Boulevard during the peak hour. (See Memorandum dated August 18, 2011, from Gibson Transportation Consulting, Inc., in Appendix FEIR-4 of this Final EIR.) Further, the bicycle path along Cahuenga Boulevard is designated as a Priority 2 facility within the 2010 Bicycle Plan’s Five-Year Implementation Plan. As noted in Response to Comment No. 3-4, Chapter 5, Implementation, of the 2010 Bicycle Plan, acknowledges that many future bicycle lanes will require additional CEQA analysis, particularly with respect to impacts on traffic. The proposed transportation mitigation measures generally would not prevent the implementation of the City’s Bicycle Plan, but may require the decision-makers to prioritize varying Transportation Element policies applicable to the Project. For example, the proposed bike lanes on Cahuenga Boulevard may require removal of existing travel lanes on these streets to accommodate the new bike lanes; i.e., the proposed bike lanes cannot be accommodated within existing right-of-way even in the absence of the Project’s transportation mitigation measures. Such roadway configuration changes on streets with high automobile traffic volumes would result in a significant impact on vehicular mode of travel.
Comment No. 3-10

Similarly, the Draft EIR fails to consider impacts on bicyclists using the Universal City Red line station to access any part of the region other than the immediate project. The Draft EIR fails to discuss how increased vehicular traffic will impact bicyclists on “backbone” streets like Cahuenga, Lankersheim [sic] and Ventura Boulevard, or propose any mitigations for these impacts. In short, the NBC Universal project is located at a critical junction point in the Los Angeles bicycle network, and the Draft EIR fails to recognize this fact or analyze the impacts.

Response to Comment No. 3-10

As stated in Response to Comment No. 3-8, above, the Project’s traffic impact analysis is consistent with the lead agency’s adopted methodologies and consistent with those used for other developments in the City of Los Angeles. The commenter is also referred to Response to Comment Nos. 3-3, 3-4, 3-8 and 3-9, above.

Comment No. 3-11

The Los Angeles Bicycle Advisory Committee expects that the Department of City Planning will require the final EIR to thoroughly address all of these issues.

Response to Comment No. 3-11

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment Letter No. 4

Carol Armstrong  
Los Angeles River Project Office  
Bureau of Engineering  
City of Los Angeles Department of Public Works  
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Los Angeles, CA 90015  
carol.armstrong@lacity.org

Comment No. 4-1


Response to Comment No. 4-1

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft EIR are provided and responded to below.

Comment No. 4-2

The NBC Universal Evolution Plan (Project) offers considerable promise through its proposed economic development benefits to the City of Los Angeles, including the creation of much-needed jobs; however, these must be balanced with the region’s long-term quality-of-life goals. As a major institution in the cultural life of Los Angeles, NBC Universal has a chance to implement the Project in a way that will not only benefit the future residents, workers, and visitors to the Universal City area, but also the millions of people who live throughout the South Coastal region, by providing a meaningful connection to the planned 102-mile Los Angeles River (River) Greenway. The River Greenway is as much about connecting historically-divided communities through expanded opportunities for safe, multi-modal public access as it is about improving the natural environment.

The Los Angeles City Council adopted the long-range Los Angeles River Revitalization Master Plan (Plan) in 2007 and it proposes the creation of the continuous River Greenway trail system, including bike paths, for the first 32 miles of the River that flow within the City (which supports Los Angeles County’s vision for a greenway along the entire 51 miles of the River as outlined in its 1996 River Plan). The Universal Studios stretch of the River is so critical that a future, revitalized vision of it is featured on the cover of the City’s Plan and its Project No. 109 (Plan, p. 10-28) – on the Universal Studios bank of the River -- is
identified as the “Cahuenga to Headworks River Greenway.” The City’s updated (2010) Bicycle Plan, part of the Transportation Element of its General Plan, also includes a bike path along this part of the River.

Additionally, as noted in the City’s General Plan Land Use Element Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, the River is a central feature:

- Chapter 4 identifies actions which are recommended to be promoted by “private sector entities” among others, to “Coordinate with City departments, neighborhood [sic] cities and County, State and Federal agencies to utilize existing public lands such as flood control channels, utility easements and Department of Water and Power properties to provide for such recreational uses as hiking, biking and horseback riding, where possible.” (p. IV-1, italics added)

- Regarding commercial land uses, “Where appropriate direct commercial storefront development toward the Los Angeles River by developing design standards that compliment [sic] [Pubs note: [sic] appears in original text] the uniqueness of the river.” (p. I-4)

- Objective 2-5: To promote development of commercial properties adjacent to the Los Angeles River.

- Policy 2-5.1: Require that future development of properties located along the Los Angeles River be designed with river access features. (p. III-9)

- Policy 4-1.2: Increase accessibility to The Los Angeles River. (p. III-12) …assure that properties adjacent to the river develop an integrated design element to promote the use of the river as a recreational asset. (p. III-12)

- Policy 14-1.1: Assure that local bicycle routes are identified and linked with routes of neighboring areas of the City…The Community Plan endorses full implementation of the City’s Bicycle Plan, which designates bikeways for the following; Los Angeles River, Tujunga Wash, Laurel Canyon, Woodman, Valley Vista Boulevard, Mulholland Drive, Riverside Drive, and Sepulveda Boulevard. (p. III-23, italics added)

On pp. 511-512, the DEIR claims consistency with the Community Plan’s open space goals, as follows:

The proposed Project would not be inconsistent with this policy as it would include a system of parks, including the publicly accessible Trailhead Park along the Los Angeles River Flood Control Channel frontage in the northeast corner of the Project Site that would serve on-site residents and the residents of the Community Plan area. This area would
also provide access to the Los Angeles River Flood Control Channel. Public facilities would include picnic facilities, benches, trail heads, and trails.

Although the DEIR claims that these Project elements, including the proposed “Open Space District No. 3” (map on p. 453; description on p. 455), which includes the new “Trailhead Park,” are adequate for compliance with the County’s River Master Plan (p. 497) and City’s River Revitalization Plan (pp. 523-24), this is not sufficient compensation for removing a nearly 2-mile stretch of the River Greenway from public access and it would serve on-site stakeholders who would be dependent upon a new tram/shuttle service (p. 497) at the expense of others from outside the area, who could otherwise pass through via the River Greenway.

**Response to Comment No. 4-2**

The Project does not preclude a bike path along the Los Angeles River Flood Control Channel. As explained on pages 418–419 in Section IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft EIR, the northeastern portion of the Project Site that abuts the Los Angeles River Flood Control Channel is within the jurisdiction of the City of Los Angeles. The remaining approximately three-fourths of the northern edge of the Project Site is adjacent to River Road, a two-lane roadway that runs along the Los Angeles River Flood Control Channel. The majority of this northern edge is within the jurisdiction of the County of Los Angeles and the majority of the River Road roadway is owned by the Los Angeles County Flood Control District. As stated in Section IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft EIR, the Applicant would cooperate with the County, City, and other agencies, as necessary, to accommodate the future use of the County land for public use as contemplated by the County River Master Plan and to continue use, if allowed by the County, of a portion of River Road for studio access. If the County implements a public trail on the County owned portion of the Los Angeles River Flood Control Channel frontage, that path could be connected to the proposed River Trailhead Park and the proposed internal bike path along the proposed North-South Road. Therefore, the Project would not create a gap in the public path proposed along the Los Angeles River Flood Control Channel in the referenced City and County plans.

As explained in more detail on pages 496–497 and 523–524 of the Draft EIR, with these and other project design features, the Project furthers the goals and objectives of, and would not be inconsistent with, the Los Angeles River Master Plan and the Los Angeles River Revitalization Master Plan. Similarly, the Project would not be inconsistent with the County Draft Bicycle Plan or City Bicycle Plan proposals for a bike path along the Los Angeles River Flood Control Channel. In addition, Section IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft EIR, analyzed the Project in relation to adopted planning policies, including those set forth in the Sherman Oaks–Studio City–Toluca Lake–
Cahuenga Pass Community Plan, and concluded that Project impacts with respect to land use plans would be less than significant.

**Comment No. 4-3**

Moreover, the proposals are contingent upon significant prior approvals, including the following:

- **City General Plan Amendments**: to, among other requests, “remove the Open Space designation from the slivers of the Project Site along the northern edge adjacent to the Los Angeles River Flood Control Channel.” (DEIR, p. 438; also see land ownership map on p. 541)

- **A New Universal City Specific Plan**: which states that uses, such as surface parking, would be allowed anywhere and that, “New buildings…would be located at least 12 feet from the channel wall of the Los Angeles River Flood Control Channel.” (DEIR, p. 458) Overall, the new City Specific Plan would “represent a more intense use of the land than under the existing Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan designation and the proposed land uses would NOT be consistent with existing designations.” (DEIR, p. 504, emphasis added)

- **A New County Specific Plan**: “the requested approvals would place these areas in the County’s jurisdiction and City zoning would no longer apply. Impacts would therefore be less than significant.” (p. 526-527)

- **Annexation and Rezoning**: Certification of the Draft and Final EIR and approval of the proposed Specific Plans may occur prior to the Local Agency Formation Commission’s decision making regarding the approval of the proposed annexation and detachment requests. If the proposed annexation and detachment actions do not occur, the 76 acres of unincorporated County land proposed for annexation to the City of Los Angeles would remain in unincorporated County and the 32 acres proposed for detachment from the City of Los Angeles to unincorporated Los Angeles County would remain in the City of Los Angeles. (DEIR, p. 533; see also p. 526)

Regarding compliance with the County’s 1996 River Plan, “The land adjacent to the Los Angeles River Flood Control Channel and east of the City and County jurisdictional boundary near Lakeside Plaza Drive is owned by the Applicant. The land adjacent to the Los Angeles River Flood Control Channel west of that City and County jurisdictional boundary is owned by the County. The approximate width of this County land ranges from 20 to 24 feet. The Applicant would cooperate with the County, City and other agencies as necessary, to accommodate the future use of a portion of the County land (River Road) for public use as contemplated by the County River Master Plan and to continue use of a portion of River Road for studio access.” (DEIR, p. 496)
Given the above approval conditions and claims, the Project proponent is assuming a consistency with adopted plans that is contingent upon various public agencies’ future approval of their proposed land use changes and, simultaneously, abdicating to some of those same agencies its own obligation to comply with prevailing land use policies—e.g., to allow/facilitate/build the River Greenway along Universal Studios.

Response to Comment No. 4-3

Implementation of the Project would require approvals from both the City and County of Los Angeles, including, as referenced in the comment, an amendment to the City’s General Plan, approval of the proposed City and County Specific Plans, and approval of the proposed annexation and detachment requests.

The proposed City General Plan amendments include amendments to reflect the proposed annexation and detachment, amendments to the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan to designate the City portion of the Project Site as Regional Commercial and to remove existing designations corresponding to the existing City portions of the Project Site, including the referenced Open Space designation from the slivers of the Project Site along the northern edge adjacent to the Los Angeles River Flood Control Channel. These slivers are currently isolated areas in the City jurisdiction that are surrounded by areas of the Project Site that are in the unincorporated County. (See page 438 in Section IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft EIR.)

The proposed City Specific Plan would allow for the development of a new mixed-use residential community with up to 2,937 dwelling units, 115,000 square feet of new retail uses, and 65,000 square feet of new community serving uses, as well as 50,000 square feet of new studio uses and 250,000 square feet of new studio office uses. The proposed City Specific Plan is included as Appendix A-1 of the Draft EIR and is summarized on pages 449–465 of the Draft EIR.

The proposed County Specific Plan allows for the continuation and expansion of the broad range of existing uses in the Business, Studio, and Entertainment Areas of the Project Site. The proposed County Specific Plan is included as Appendix A-2 of the Draft EIR and is summarized on pages 439–449 of the Draft EIR.

Under the proposed Project, portions of the Project Site that are currently in the County of Los Angeles would be annexed into the City of Los Angeles, while other areas would be detached from the City of Los Angeles and returned to the jurisdiction of the County of Los Angeles. The proposed Specific Plans reflect the proposed annexation and detachment. The proposed Project involves the annexation of approximately 76 acres of the Project Site from the County’s jurisdiction into the City of Los Angeles, which would
accommodate all of the proposed residential uses in the City of Los Angeles. The proposed Project would also involve detachment of approximately 32 acres of the Project Site from the City’s jurisdiction into the County, for an overall net change of the approximately 44 acres from the County to the City. Should the annexation process be completed, approximately 139 acres of the Project Site would be located within the City of Los Angeles and the remaining approximately 252 acres of the Project Site would be located within the unincorporated area of Los Angeles County. If the proposed annexation and detachment do not occur, the 95 acres of the Project Site currently located within the City of Los Angeles would remain located in the City, while the other 296 acres would remain under the jurisdiction of the County. The discussion within each environmental impact section of the Draft EIR was conducted based on proposed jurisdictional boundaries (i.e., the proposed Project) and existing jurisdictional boundaries (i.e. No Annexation scenario). (See pages 282–286 in Section II, Project Description, of the Draft EIR.)

As explained in more detail in Section IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft EIR, the proposed Project, with the granting of the requested land use approvals by the City and County of Los Angeles, would not be inconsistent with the goals, policies, objectives, and land use/zoning designations established by both the City and County land use plans and zoning codes, as well as the goals and objectives established by land use plans prepared by the Southern California Association of Governments.

The Project is not abdicating any obligations to comply with prevailing land use policies. As explained in Response to Comment No. 4-2, above, the Project does not preclude a bike path along the Los Angeles River Flood Control Channel. The commenter is referred to Response to Comment No. 4-2, above.

Comment No. 4-4

Furthermore, whereas the Project proponent is committing to “implementing a Transportation Demand Management program to the satisfaction of the Los Angeles Department of Transportation, which will help reduce traffic impacts of the Project by encouraging Project employees and patrons to reduce vehicular traffic on the street and freeway system during the most congested time periods of the day...including, but not limited to...[creating a] bicycle and pedestrian-friendly environment (i.e., established and clear pedestrian networks, intersections, and built environments) and bicycle amenities” (p. 513) and claims consistency with the General Plan’s Transportation Element (p. 518), the River bike path is not included.

Response to Comment No. 4-4

Please refer to Response to Comment No. 4-2 regarding implementation of a bike path along the Los Angeles River Flood Control Channel and the Project’s consistency with
applicable land use plans and policies. In addition, the Project, as shown in Figure 21 on page 336 in Section II, Project Description, of the Draft EIR, includes the pedestrian/bicycle connection to CityWalk, as contemplated by the County River Master Plan. This internal circulation is not proposed as a substitute for the path along the Los Angeles River Flood Control Channel. Further, in the northeastern portion of the Project Site that is within the City’s jurisdiction and owned by the Applicant, the Project proposes a River Trailhead Park that would provide access to the Los Angeles River Flood Control Channel, and connect the existing bike path along Forest Lawn Drive and the proposed bike path along the proposed North-South Road.

Comment No. 4-5

Finally, the DEIR states that no mitigation is necessary for cumulative impacts (p. 590); however, as proposed, the Project’s DEIR would not allow public access to the River right-of-way (currently in public ownership) and would, instead, direct members of the public, such as cyclists and pedestrians, up a steep hillside and away from the River; and this, considered in combination with the proposed impacts of the Metro Universal Project (Planning Case No. ENV-2007-933-EIR, State Clearinghouse Number 2007061078) for which the City submitted similar comments to your office in November 2008, would result in substantial cumulative impacts regarding public access.

Response to Comment No. 4-5

As explained in Response to Comment Nos. 4-2 and 4-4, above, the proposed Project would not preclude public access to the Los Angeles River Flood Control Channel and the proposed on-site bicycle network is not proposed as a substitute for a path along the Los Angeles River Flood Control Channel. Please refer to Response to Comment Nos. 4-2 and 4-4 with regard to providing access along the Los Angeles River Flood Control Channel. As the Project does not preclude implementation of a bike path along the Los Angeles River Flood Control Channel, the Project’s impacts would not be cumulatively considerable.

The commenter is also referred to Topical Response No. 3: Defining the Proposed Project (see Section III.C, Topical Responses, of this Final EIR) regarding the proposed Metro Universal project.

Comment No. 4-6

From the perspective of the City, the Project -- as proposed in the DEIR -- does not go far enough in addressing the potential circulation hazards that would result from diverting cyclists, pedestrians, and other members of the public up the hill and into the Universal City area unnecessarily -- when they could more easily and safely avoid potential vehicular
conflicts and terrain changes by following the River path. Although Open Space District 3 and Trailhead Park are meant to serve as compliance with prevailing River Plans; they lack any meaningful function in the absence of public access to the River along the entire Universal Studio stretch. Fundamentally, this is not consistent with the City’s long-term goals of fostering greater public awareness of and access to the River. Thus, given that the Project’s DEIR fails to include the River Greenway along the Universal Studios bank of the River as part of its proposed amenities, the proposed Project may be considered “inconsistent with the City or County General Plan or other adopted environmental goals contained in other applicable plans.” (DEIR, p. 438) and, counter to its assertion on p. 523, the project’s land use impacts would not be less than significant; and, therefore, mitigation is very likely warranted.

Response to Comment No. 4-6

Please refer to Response to Comment Nos. 4-2 through 4-5, above, regarding the implementation of a bike path along the Los Angeles River Flood Control Channel and the Project’s consistency with applicable land use plans and policies.

Comment No. 4-7

Segments of the River Greenway have already been implemented upstream in Studio City and downstream in the Glendale Narrows; to not allow and facilitate the River Greenway along Universal Studios would create a huge gap in public circulation --particularly in an area that already features congested roadways and that, through the Project, will generate considerably more vehicular congestion.

Incorporating projects of the City’s 2007 River Revitalization Plan in the design and/or mitigation planning for the Project (e.g., the Cahuenga to Headworks River Greenway (Project 109); the Lankershim Boulevard Arterial Green Street (Project 106); Lankershim Boulevard River Bridge (Project 107); Lankershim Boulevard and Cahuenga Boulevard Enhanced Intersection (Project 108); and Weddington Park to Riverside Drive River Greenway (Project 105)) would be substantially more appropriate than the Project as proposed. These projects would:

• Provide safe, non-motorized access to and from the area for visitors to Universal City, Campo de Cahuenga, Weddington Park, and the Metro Station, resulting in avoidance of pedestrian/auto conflicts;

• Provide incentives for walking and cycling instead of driving, resulting in concomitant air quality and public health improvements;

• Encourage the use of public transit and non-motorized links to it; and
• Open up the area to workers from other communities who may not have access to cars.

Riverfront property is not limitless; therefore, it is critical that the City encourage proper use and celebration of it whenever possible. The Project’s proponents now have an opportunity to design and build a greenway along the River that is consistent with the City and County Plans -- one which would allow and facilitate multi-modal public access to Universal City, the existing Universal City Metro Red Line Station, and beyond. I encourage the Project proponents to consider the value of having NBC Universal take the lead in demonstrating how the private sector can be an unparalleled partner in making Los Angeles River revitalization a model for cities worldwide.

**Response to Comment No. 4-7**

As stated in Response to Comment Nos. 4-2 through 4-5, above, the Project does not preclude the implementation of recreational amenities along the Los Angeles River Flood Control Channel. Further, as the Draft EIR concludes that Project impacts with regard to the various plans that pertain to the Los Angeles River Flood Control Channel are less than significant, mitigation measures, including, but not limited to, those identified in the comment, are not required by CEQA. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 4-8**

Please coordinate the implementation of any project design and/or mitigation elements with us in the City’s Los Angeles River Project Office. Thank you very much for your consideration of my comments.

**Response to Comment No. 4-8**

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment Letter No. 5

Ali Poosti, Acting Division Manager
City of Los Angeles
Wastewater Engineering Services Division
Bureau of Sanitation

Comment No. 5-1

This is in response to your letter requesting a review of your proposed project. The Bureau of Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project.

The proposed project site is generally bounded by the Los Angeles River Flood Control Channel (LAFCC) to the north, the Hollywood Freeway to the south, Barham Blvd. and residences to the east, and Lankershim Blvd and Metro’s Red Line Universal City station to the west. The project site has been broken into four (4) areas: Studio Area, Business Area, Entertainment Area, and the Mixed Use Residential Area as shown in Figure 14.

Response to Comment No. 5-1

The introductory comments are noted and have been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. The comment accurately describes the general boundaries of the Project Site; it should be noted that the Hollywood Freeway constitutes the southern edge except for the area that includes the Sheraton and Hilton Hotels and the 10 Universal City Plaza office building (see page 272 in Section II, Project Description, of the Draft EIR). Additionally, the Universal City Metro Red Line Station is immediately to the west of the Project Site, across Lankershim Boulevard (see page 602 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR). Specific comments regarding the environmental analysis in the Draft EIR are responded to below.

Comment No. 5-2

WASTEWATER REQUIREMENT

The Bureau of Sanitation, Wastewater Engineering Services Division (WESD) is charged with the task of evaluating the local sewer conditions and to determine if available wastewater capacity exists for future developments. The evaluation will determine cumulative sewer impacts and guide the planning process for any future sewer improvements projects needed to provide future capacity as the City grows and develops.
The project is located within both County of Los Angeles and City of Los Angeles boundaries. Based on the information provided by the developer, the County currently provides no wastewater services for the project site and has no wastewater infrastructure servicing this location. Therefore, all wastewater collection and treatment for this project will be provided by the City.

Projected Wastewater Discharges for the Proposed Project:

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<th>Proposed No. of Units</th>
<th>Average Daily Flow (GPD)</th>
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<td>Studio</td>
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<td>Total Proposed Project Flow</td>
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Response to Comment No. 5-2

As the comment notes, the County does not provide wastewater services for the Project Site and does not have wastewater infrastructure serving the Project Site or vicinity. As explained on page 1840 in Section IV.L.1, Utilities – Sewer, of the Draft EIR, all wastewater collection and treatment for the Project Site and vicinity is provided by the City.
The comment includes projected wastewater discharges for the proposed Project by land use within each Area of the Project Site (e.g., Studio Area, Entertainment Area, Business Area, and Mixed-Use Residential Area). The comment appears to include the proposed Project’s net new square footage amount for each land use within each of the Project Site’s Areas and is largely consistent with the Conceptual Development Program for the Project as shown on page 287 in Table 3 in Section II, Project Description, of the Draft EIR. It should be noted, however, that the comment misstates some of the land use square footage amounts in the Studio, Entertainment, and Business Areas, and the comment does not include the demolition of existing uses in the Studio, Entertainment, and Mixed-Use Residential Areas as set forth in the Conceptual Development Program in the Draft EIR, which the Draft EIR includes in determining the net new development. Accordingly, for ease of reference, Table 3 on page 287 of the Draft EIR, the Conceptual Development Program, is restated below.

### Table 3

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Table 3

Conceptual Development Program

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Note:  
\(^a\) Includes interim projects.  
\(^b\) Proposed child care center.  
\(^c\) Includes up to 500 hotel guest rooms and related hotel facilities.


Also, the comment includes average daily flow rates based on each type of land use. Overall, the average daily flow rates in the Draft EIR are greater, and thus more conservative, than those used in the comment. The average daily flow rates presented in the comment are the same sewer generation rates used in the Draft EIR’s analysis of Project wastewater flows for Studio and Entertainment uses (see Table 156, Project Wastewater Flows, on page 1845 in Section IV.L.1, Utilities – Sewer, of the Draft EIR). The comment indicates a lower flow rate for office use of 130 gallons per day per 1,000 square feet than used in the Draft EIR; the Draft EIR used a sewer generation rate of 180 gallons per day per 1,000 square feet of Office and Studio Office. The comment also provides a substantially lower flow rate for retail and community-serving uses in the Entertainment and Mixed-Use Residential Areas than the Draft EIR: 80 gallons per day per 1,000 square feet in the comment as compared to 408 gallons per day per 1,000 square feet in the Draft EIR (see Table 156 on page 1845 in Section IV.L.1, Utilities – Sewer, of the Draft EIR). Similarly, the comment provides an average daily flow rate of 130 gallons per day per room for the Hotel use, while the Draft EIR utilized a sewer generation rate of 260 gallons per day per room and noted that an additional 130 gallons per day per room was added to the Bureau of Sanitation’s sewer generation rate to provide a conservative estimate and to account for the additional water used by the banquet and related hotel facilities (see Table 156, note f, on page 1845 in Section IV.L.1, Utilities – Sewer, of the Draft EIR). Finally, the comment indicates an average daily flow rate of 200 gallons per day per dwelling unit for the residential units in the Mixed-Use Residential Area, based on an assumption that units are three-bedroom units. The analysis in the Draft EIR assumed a sewer generation rate of 160 gallons per day per residential unit, based on the sewer generation rate for two-bedroom units. The Draft EIR analysis of Project wastewater flows also included a separate calculation of wastewater flows associated with the child care center, based on a sewer generation rate of 8 gallons per day per child and assuming one child per 100 feet of floor area (see Table 156, note d, on page 1845 in Section IV.L.1,
Utilities – Sewer, of the Draft EIR). Overall, the Draft EIR estimates a slightly higher average daily flow than the comment and thus provides a more conservative analysis. As detailed in Table 156 of the Draft EIR, the Draft EIR estimates the Project’s average wastewater generation to be 0.896 million gallons per day, or 896,000 gallons per day, while the comment indicates that the total proposed Project flow would be 851,354 gallons per day. As noted in the Draft EIR, the wastewater analysis does not incorporate reductions in wastewater flows as a result of water conservation measures that the Project would implement and is conservative in that regard (see page 1844 in Section IV.L.1, Utilities – Sewer, of the Draft EIR).

**Comment No. 5-3**

**SEWER AVAILABILITY**

The sewer infrastructure in the vicinity of the proposed project includes the existing 18-inch line on Lankershim Blvd and an existing 72-inch La Cienega San Fernando Valley Relief Sewer (LCSFVRS) on Sierra Bonita Ave R/W. The existing 18-inch line feeds into a 24-inch line on Lankershim Blvd R/W, then connects into the existing 72-inch LCSFVRS before discharging into a 42-inch line on San Fernando Rd. The current flow level (d/D) in the 8-inch line cannot be determined at this time as gauging is needed for these lines.

Based on our existing gauging information, the current approximate flow level (d/D) and the design capacities at d/D of 50% in the sewer system are as follows:

<table>
<thead>
<tr>
<th>Pipe Diameter (in)</th>
<th>Pipe Location</th>
<th>Current Gauging d/D (%)</th>
<th>50% Design Capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td>18</td>
<td>Lankershim Blvd</td>
<td>21</td>
<td>4.34 MGD</td>
</tr>
<tr>
<td>24</td>
<td>Lankershim Blvd R/W</td>
<td>39</td>
<td>10.13 MGD</td>
</tr>
<tr>
<td>72</td>
<td>Sierra Bonita Ave R/W</td>
<td>*</td>
<td>76.24 MGD</td>
</tr>
<tr>
<td>42</td>
<td>San Fernando Blvd</td>
<td>47</td>
<td>38.18 MGD</td>
</tr>
</tbody>
</table>

*No gauging available

To accommodate the wastewater flows generated from this project, the developer has proposed to construct an off-site 16-inch sewer line along the Los Angeles River Flood Control Channel, which ultimately feeds into the LCSFVRS on Sierra Bonita Ave R/W.

Based on the estimated flows and the construction of a new 16-inch sewer line, it appears the sewer system might be able to accommodate the total flow for your proposed project.
Further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at that time. Ultimately, this sewage flow will be conveyed to the Hyperion Treatment Plant, which has sufficient capacity for the project.

If you have any questions, please call Abdul Danishwar at (323) 342-6220.

**Response to Comment No. 5-3**

The comment discusses the sewer infrastructure in the vicinity of the Project Site, including an 18-inch diameter sewer in Lankershim Boulevard, the 72-inch diameter La Cienega and San Fernando Valley Relief Sewer ("Valley Relief Sewer"), and the 42-inch sewer into which the Valley Relief Sewer discharges (see also pages 1837–1838 in Section IV.L.1, Utilities – Sewer, of the Draft EIR). The comment includes existing gauging information for the 18-inch diameter sewer in Lankershim Boulevard (21 percent approximate flow level), the 24-inch diameter sewer in Lankershim Boulevard (39 percent approximate flow level), and the 42-inch diameter sewer in San Fernando Boulevard (47 percent approximate flow level). The comment notes that current gauging data is not available for the 72-inch diameter Valley Relief Sewer or 8-inch line. Based on prior information received from the City of Los Angeles Bureau of Sanitation, the Draft EIR noted that the existing 18-, 24-, 42-, and 72-inch sanitary sewers were operating at 19 percent, 39 percent, 34 percent, and 53 percent of their capacity, respectively (see page 1838 in Section IV.L.1, Utilities – Sewer, of the Draft EIR). The updated information from the Bureau of Sanitation regarding the current gauging information for the 18-inch and 42-inch sanitary sewers included in the comment, and the Bureau of Sanitation’s terminology regarding current approximate flow levels have been incorporated into the Final EIR (see Correction and Addition Nos. IV.L.1.A, IV.L.1.B, IV.L.1.C, Appendix N-2-1.A, Appendix N-2-1.B, and Appendix N-2-1.C, Section II, of the Final EIR).

As the comment notes, to accommodate the increase in wastewater flows resulting from Project implementation, the Project includes an additional 16-inch off-site sewer line that would run parallel to the Los Angeles River Flood Control Channel along River Road and connect to an existing stub of the Valley Relief Sewer. As explained in the Draft EIR, the Project also includes as Project Design Features the construction of additional 8-, 10-, and 12-inch sewer lines in the Mixed-Use Residential Area, and removal and reconstruction of some of the existing 12-inch sewer lines along Universal Hollywood Drive. In addition, some existing on-site sewer lines in the Business, Studio, and Entertainment Areas would be replaced with larger lines to accommodate the increased wastewater flow.
as areas of the Project Site are further developed (see page 1842 in Section IV.L.1, Utilities – Sewer, of the Draft EIR).

With regard to the permit process, pursuant to Project Design Feature L.1-1 set forth on page 1852 in Section IV.L.1, Utilities – Sewer, of the Draft EIR, prior to the development of a new building, the capacity of the on-site sewer lines serving the building must be examined and replacement or new sewer lines must be installed as necessary. Further, pursuant to Project Design Feature L.1-3, new sanitary sewers in the City areas of the Project Site must be designed to conform to the standards of the City's Bureau of Sanitation, and additional on-site sanitary sewer system improvements must be constructed as required to support the additional development per these standards (see pages 1842 and 1852 in Section IV.L.1, Utilities – Sewer, of the Draft EIR). As the comment notes, the Project’s wastewater flows will be conveyed to the Hyperion Treatment Plant, which has sufficient capacity for the Project (see pages 1846–47 in Section IV.L.1, Utilities – Sewer, of the Draft EIR). As concluded in the Draft EIR, Project impacts with regard to conveyance infrastructure and Hyperion Service Area capacity are less than significant (see page 1852 in Section IV.L.1, Utilities – Sewer, of the Draft EIR.)

Comment No. 5-4

STORMWATER REQUIREMENTS

The Bureau of Sanitation, Watershed Protection Division is charged with enforcement of the provisions of the National Pollutant Discharge Elimination System (NPDES) permit.

SUSMP AND STORM WATER INFILTRATION

The proposed project is subjected to Standard Urban Stormwater Mitigation Plan (SUSMP) regulations. The proposed project is required to incorporate measures to mitigate the impact of stormwater runoff as outlined in the guidance manuals titled “Development Best Management Practices Handbook – Part B: Planning Activities”. [sic] In addition the “SUSMP Infiltration Requirements and Guidelines” prioritizes the use of infiltration and bio-filtration systems as the preferred methods to comply with SUSMP requirements. These documents can be found at: www.lastormwater.org/Siteorg/businesses/susmp/susmpintro.htm. It is advised that input regarding SUSMP requirements be received in the early phases of the project from SUSMP review staff.

GREEN STREETS

The City is developing a Green Street Initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and sidewalk of the
public right-of-way to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns. If the proposed project includes public right-of-way improvements and presents an opportunity to include Green Street elements as part of the project. The goals of the Green Street elements are to improve the water quality of stormwater runoff, recharge local ground water basins, improve air quality, reduce the heat island effect of street pavement, enhance pedestrian use of sidewalks, and encourage alternate means of transportation. The Green Street elements may include infiltration systems, biofiltration [sic] swales, and permeable pavements where stormwater can be easily directed from the streets into the parkways. For more information regarding implementation of Green Street elements, please call Wing Tam at (213) 485-3985.

Response to Comment No. 5-4

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. As detailed in the Draft EIR in Section IV.G.1.b, Water Resources – Surface Water – Surface Water Quality, the Project shall meet all applicable Standard Urban Stormwater Mitigation Plan requirements. As provided in Project Design Features G.1.b-3 and G.1.b-4, prior to the issuance of building permits, the Applicant shall prepare and submit a Standard Urban Stormwater Mitigation Plan to the applicable jurisdiction for review. In addition, drawings and specification of the proposed permanent stormwater quality Best Management Practices shall be submitted for review. As provided in Project Design Feature G.1.b-4, the proposed permanent stormwater quality Best Management Practices in the Mixed-Use Residential Area of the Project Site shall include vegetated swales, filter strips, or bioretention facilities that are integrated in the landscape areas or along the major roadways, or alternative Best Management Practice that may be suitable for localized conditions, such as media filtration or similar technology with equivalent treatment or pollutant removal technology. The proposed stormwater Best Management Practices (such as vegetated swales, filter strips or bioretention) along major roadways is aligned with the City’s Green Street Initiatives, which is a tool to assist developers in identifying and selecting appropriate Best Management Practices for green infrastructure projects to better manage the City’s stormwater and urban runoff (Green Streets & Green Alleys Design Guideline Standards, 1st Edition, City of Los Angeles, September 4, 2009). In addition, as noted on pages 1383–1385 in Section IV.G.1.b, Water Resources – Surface Water – Surface Water Quality, of the Draft EIR, the County portions of the Project Site would comply with the County Low Impact Development Standards as applicable pursuant to the proposed County Specific Plan.
Comment No. 5-5

WET WEATHER EROSION CONTROL

A Wet Weather Erosion Control Plan is required for construction during the rainy season (between October 1 and April 15 per Los Angeles Building Code, Sec. 7002). For more information, please see attached Wet Weather Erosion Control Guidelines.

Response to Comment No. 5-5

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. As detailed in Section IV.G.1.b Water Resources – Surface Water – Surface Water Quality, of the Draft EIR, beginning on page 1389, construction impacts due to Project development would be minimized during all phases of Project construction through compliance with the Construction General Permit. This permit requires the development and implementation of a Stormwater Pollution Prevention Plan, which would include erosion and sediment control Best Management Practices that would meet or exceed measures required by the Construction General Permit. A Stormwater Pollution Prevention Plan would be developed as required by, and in compliance with, the Construction General Permit and the applicable City and/or County ordinances, including grading ordinances. A Wet Weather Erosion Control Plan would also be developed as part of the Stormwater Pollution Prevention Plan compliance as applicable.

Comment No. 5-6

STORM WATER POLLUTION PREVENTION PLAN

A Storm Water Pollution Prevention Plan (SWPPP) is required for land disturbance activities over one acre. The SWPPP must be maintained on-site during the duration of construction.

WPD staff is available at your request to provide guidance on stormwater issues. Should you have any questions, please contact Kosta Kaporis at (213) 485-0586.

Response to Comment No. 5-6

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. As noted in Response to Comment No. 5-5, above, the Draft EIR acknowledges that a Stormwater Pollution Prevention Plan would be developed as required by, and in compliance with, the
Construction General Permit and the applicable City and/or County ordinances, including grading ordinances.

**Comment No. 5-7**

**SOLID RESOURCE REQUIREMENTS**

The City has a standard requirement that applies to all proposed residential developments of four or more units or where the addition of floor areas is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more. Such developments must set aside a recycling area or room for onsite recycling activities. For more details of this requirement, please contact Special Projects Division.

Special Projects staff is available at your request to provide guidance on solid resource issues. Should you have any questions, please contact Daniel Hackney at (213) 485-3684.

**Response to Comment No. 5-7**

As provided on page 1925, in Section IV.L.3, Utilities – Solid Waste, of the Draft EIR, the Project would implement the following project design features which address the comment:

- **Project Design Feature L.3-2**: All structures constructed or uses established within any part of the proposed Mixed-Use Residential Area shall be designed to be permanently equipped with clearly marked, durable, source sorted recycling bins to facilitate the separation and deposit of recyclable materials.

- **Project Design Feature L.3-3**: Primary collection bins within any part of the Mixed-Use Residential Area shall be designed to facilitate mechanized collection of such recyclable wastes for transport to on or off-site recycling facilities.

- **Project Design Feature L.3-4**: Within any part of the Mixed-Use Residential Area, the Applicant or its successor shall continuously maintain in good order clearly marked, durable and separate recycling bins on the same lot or parcel to facilitate the deposit of recyclable or commingled waste metal, cardboard, paper, glass, and plastic therein; maintain accessibility to such bins at all times for the collection of such wastes for transport to on- or off-site recycling plants; and require waste haulers to utilize local or regional material recovery facilities as feasible and appropriate.
Comment Letter No. 6

Ron Ostrow, President
Greater Griffith Park Neighborhood Council
P.O. Box 27003
Los Angeles, CA 90027

Comment No. 6-1

The Greater Griffith Park Neighborhood Council (GGPNC) has reviewed the Draft EIR of the NBC Universal Expansion project and has serious concern about its scope and findings.

NBC/Universal undertook significant outreach in the communities covered by the GGPNC, including direct mail campaigns soliciting the support of local area residents. This was undoubtedly done in recognition of the direct impact to area residents and Griffith Park itself. However, the Draft EIR fails to include sufficient study and analysis of this impact.

Response to Comment No. 6-1

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft EIR are provided and responded to below.

Comment No. 6-2

While the traffic study conducted for the Draft EIR extends nearly ten miles west to Sepulveda Blvd, it inexplicably extends only 1.5 miles along Forest Lawn Drive. This effectively ignores the potential negative impact on the very residents and areas your outreach previously identified as important to the success of the project.

As a result of the failure to conduct the proper level of due diligence, and by excluding Griffith Park and the greater Los Feliz community from the study, the Draft EIR ignores the potential adverse impact of the project to residents and important historical and cultural monuments within our area.

In order to perform a truly comprehensive impact study, the Draft EIR must include Route 134, the Interstate 5 interchange, Interstate 5 access at Zoo Drive and the entire Los Feliz community including Griffith Park.
Response to Comment No. 6-2

As set forth in Section IV.B.1.2.a of the Draft EIR and Chapters I and II of Transportation Study for the NBC Universal Evolution Plan Environmental Impact Report (Gibson Transportation Consulting, Inc. and Raju Associates, Inc., March 2010) (the "Transportation Study") included as Appendix E-1 to the Draft EIR, the Study Area used in the Transportation Study was designed to ensure all potentially significantly impacted intersections, prior to any mitigations, were analyzed. The Study Area was adjusted as necessary to confirm that there were no impacts at or outside the boundary of the Study Area, as such the edges of the traffic Study Area were not equidistant from the Project Site in all directions. The Study Area was developed by Gibson Transportation Consulting, Inc. and Raju Associates, Inc., in conjunction with the Los Angeles Department of Transportation (LADOT).

The traffic analysis was reviewed and approved by LADOT (see the LADOT Assessment Letter included as Appendix E-2 to the Draft EIR).

As shown in Figures 66 and 67 in Section IV.B.1 of the Draft EIR and Figures 31 and 32 in Chapter IV of the Transportation Study, the Project is expected to result in a significant impact at the intersection of Forest Lawn Drive & Zoo Drive (Intersection 59). A detailed analysis was conducted for the intersections east of this location along Forest Lawn Drive, which is the predominant direction of travel for the Project traffic. As shown in Figures 66 and 67 in Section IV.B.1 of the Draft EIR and Figures 31 and 32 in Chapter IV of the Transportation Study, the Project is not expected to result in a significant traffic impact at any intersections along the Forest Lawn Drive corridor east of Zoo Drive. The Study Area does not include intersections along Zoo Drive south of Forest Lawn Drive as the Project is expected to add approximately 13 trips to Zoo Drive and approximately 20 trips to Griffith Park Drive. Given the traffic operating conditions on these streets during the peak hours, this level of traffic would not result in a significant impact on intersections at either street.

Similarly, the Project is not expected to add any traffic to the intersection of Zoo Drive & I-5 northbound ramps. The Project is expected to add approximately 11 trips to the intersection of Zoo Drive & I-5 southbound off-ramp during the afternoon peak hour and no trips during the morning peak hour. Given the traffic operating conditions at these intersections during the peak hours, this level of traffic is not expected to result in a significant impact.

With regard to the SR 134–I-5 interchange, as shown in Figures 71 and 90 in Section IV.B.1 of the Draft EIR and Figure 36, 47, and 63 of the Transportation Study (segments 9, 12, and 13), the Project does analyze freeway segments on both the SR 134...
and the I-5 adjacent to the interchange. As shown in the figures, the Project is not expected to result in a significant impact at these segments during either peak hour.

**Comment No. 6-3**

The GGPNC believes that increased car trips through the park due to added congestion on all neighboring freeways will have an accumulated impact in multiple areas including but not limited to:

- Safety and tranquility of park users, runners, bikers, equestrians, hikers, picnickers.
- Sustainability of existing wildlife corridors
- Traffic congestions bleeding into the Los Feliz community
- Overall quality of life

**Response to Comment No. 6-3**

As stated in Response to Comment No. 6-2, the proposed Project is forecasted to generate a very limited number of additional vehicle trips through Griffith Park. These vehicle trips would occur within the existing roadways, including Forest Lawn Drive, Griffith Park Drive, Zoo Drive, the Ventura Freeway and the Golden State Freeway. Terrestrial wildlife movement within this area is already constrained by Forest Lawn Drive and the Ventura Freeway, and further to the east by Crystal Springs Drive and the Golden State Freeway, which are also located within Griffith Park. The additional vehicle trips on these existing roadways from the Project represent a very small incremental increase in traffic volume along these roadways and are not of a sufficient magnitude to alter safety of park users, sustainability of existing wildlife movement patterns, or result in traffic congestion in the Los Feliz community.

As noted in Response to Comment No. 6-2, above, the Study Area used for the traffic analysis of the Draft EIR was designed to ensure all potentially significantly impacted intersections, prior to any mitigations, were analyzed. The Study Area was adjusted as necessary to confirm that there were no impacts at or outside the boundary of the Study Area. The Project is not expected to add enough traffic to streets within Griffith Park to result in a significant traffic impact within Griffith Park or through the park to the eastern portion of the Los Feliz community.

In addition, as shown in Figures 66 and 67 in Section IV.B.1 of the Draft EIR and Figures 31 and 32 in Chapter IV of the Transportation Study, the Project does not result in a significant impact at the two intersections closest to the southwestern boundary of the
Los Feliz community—Cahuenga Boulevard & Hollywood Boulevard (Intersection 70) and Vine Street & Franklin Avenue/US 101 southbound off-ramp (Intersection 71). As shown in Figure 62 in Section IV.B.1 of the Draft EIR and Figure 27 in Chapter IV of the Transportation Study, the Project adds a maximum of 5 trips to one direction on Hollywood Boulevard and 8 trips to one direction on Franklin Avenue. This level of traffic translates to a maximum increase of 0.006 in V/C ratio assuming the lowest lane capacity of 1,325 vehicles per hour per lane (vphpl) per the “Critical Movement Analysis—Planning” (Transportation Research Board, 1980) methodology. Per LADOT’s significant impact criteria, this level of increase would not result in a significant impact even if the intersections along these two corridors were operating at Level of Service F.

Further, it is noted that the Draft EIR recommends Mitigation Measure B-7, which provides, in part, for widening the Forest Lawn Drive northbound approach at Zoo Drive to provide two through lanes and a right-turn lane, widening the southbound approach and southbound departure at Zoo Drive to provide an additional through lane, widening the Forest Lawn Drive southbound approach and southbound departure at the Ventura Freeway eastbound ramps to provide an additional through lane and widening the Forest Lawn Drive southbound departure at the Ventura Freeway westbound ramps to provide an additional through lane. These segments of Forest Lawn Drive, Zoo Drive and the Ventura Freeway are within the northernmost boundaries of Griffith Park. Forest Lawn Drive is an existing Major Class II Highway. As shown on the Forest Lawn Layout Exhibit presented in Appendix Q of the Transportation Study (Volume 13 of the Draft EIR), the recommended widenings would occur within the existing right-of-way of Forest Lawn Drive and Zoo Drive and would consist of a varied width of up to 10 feet of additional pavement within the right-of-way. The limited additional pavement within the existing right-of-way that would result from the implementation of Mitigation Measure B-7 and incremental increase in traffic volume along these roadways would not alter the existing wildlife movement patterns.

Quality of life is not an environmental topic addressed under CEQA. Environmental issues set forth under CEQA (e.g., traffic, land use, air quality) are addressed throughout the Draft EIR by subject category.

**Comment No. 6-4**

While the GGPNC recognizes [the] study to list historically significant location[s w]as performed prior to Griffith Park receiving Historic Cultural Monument status, the park was designated a landmark in January 2009 and any final report must include this designation and the potential impact on this historic resource.
Response to Comment No. 6-4

Griffith Park was designated as a Historical Cultural Monument in 2009. This is acknowledged as a correction and addition to the Draft EIR (see Correction and Addition No. IV.J.1.B, Section II, of this Final EIR).

Project construction is confined to the Project Site, therefore, no direct impacts to the Griffith Park Historic Cultural Monument are anticipated. As discussed in Response to Comment No. 6-3, above, Mitigation Measure B-7 includes widening of portions of Forest Lawn Drive and Zoo Drive. These segments of Forest Lawn Drive, Zoo Drive and the Ventura Freeway are within the northernmost boundaries of Griffith Park. Forest Lawn Drive is an existing Major Class II Highway. As shown on the Forest Lawn Layout Exhibit presented in Appendix Q of the Transportation Study (attached as Appendix E-1 to the Draft EIR), the recommended widenings would occur within the existing right-of-way of Forest Lawn Drive and Zoo Drive and would consist of a varied width of 10 feet of additional pavement within the right-of-way. As the roadway improvements would occur within the existing right-of-way, no impact is anticipated to the character-defining features of the Griffith Park Historic Cultural Monument and, therefore, there would be a less than significant impact on the cultural monument.

Comment No. 6-5

The GGPNC requests that the Draft EIR be amended before its moves to the final EIR stage to include a thorough study and consideration of the impacts of increased traffic and population density to the area east of the NBC Universal Expansion Plan.

Response to Comment No. 6-5

Traffic impacts associated with the proposed Project are discussed in Section IV.B.1, Traffic/Access – Traffic/Circulation of the Draft EIR and population impacts are discussed in Section IV.N.3, Employment, Housing and Population – Population, of the Draft EIR. As discussed in Response to Comment No. 6-2, the Draft EIR analyzes the potential traffic impacts of the proposed Project to the area east of the Project Site. Based on this analysis it was concluded that the Project is not expected to add enough traffic to streets within Griffith Park to result in a significant impact within the park or through the park to the Los Feliz community. See also Response to Comment No. 6-3.

With regard to population density, as discussed on page 2090 in Section IV.N.3, Employment, Housing and Population – Population, the Project would respond to, but satisfy only a portion of, unmet population growth, rather than inducing population growth, and would be consistent with regional polices to reduce urban sprawl, efficiently utilize existing infrastructure, reduce regional congestion and improve air quality through the
reduction of vehicle miles traveled. Therefore, the Project’s population impacts would be less than significant. Further, it should be noted that Griffith Park is a regional park. As discussed in the City of Los Angeles Public Recreation Plan, a regional park normally serves persons living throughout the Los Angeles basin. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment Letter No. 7

Ron Ostrow, President  
Greater Griffith Park Neighborhood Council  
P.O. Box 27003  
Los Angeles, CA  90027

Comment No. 7-1

The NBC Universal Evolution Project draft environmental impact report consists of over thirty nine thousand pages and contemplates extensive changes that, if implemented, will irrevocably affect the future of Los Angeles. The current time schedule does not allow for adequate review by community members considering the scope of the project and other concurrent events.

The Greater Griffith Park Neighborhood Council hereby respectfully requests that the public comment period be extended by at least three months.

Response to Comment No. 7-1

A public comment period for the Draft EIR was provided extending from November 4, 2010, to January 3, 2011, and was subsequently extended by the City Planning Department to February 4, 2011. This resulted in a 93-day written public comment period (November 4, 2010, through February 4, 2011), which substantially exceeds the 45-day minimum public review time period requirements set forth by the CEQA Guidelines (Section 15087(c)). In addition, a public comment meeting was held on December 13, 2010.

Consistent with CEQA requirements, public participation in the EIR preparation process also occurred during the scoping period for the EIR. In July 2007, the City filed and circulated for a 30-day public review a Notice of Preparation for the Draft EIR to receive public input on the scope of the Draft EIR. In addition, a public scoping meeting was held on August 1, 2007. Based on public comments and an Initial Study of the potential environmental issues, the Draft EIR analyzes 15 potential impact areas.

As required by CEQA Guidelines Section 15151, the Draft EIR provides decision-makers with a sufficient degree of information and analysis for a project of this scope to enable them to make a decision which fully takes account the Project’s potential environmental consequences. Consistent with CEQA Guidelines Section 15147, the information contained in the Draft EIR included summarized technical data, maps, diagrams, and similar relevant information sufficient to permit a full assessment of the Project’s potential significant environmental impacts by reviewing agencies and members.
of the public. The Draft EIR summarized technical and specialized analysis in the body of the Draft EIR and attached technical reports and supporting information as appendices to the main body of the Draft EIR, consistent with CEQA requirements. (See CEQA Guidelines Section 15147.) The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Please also refer to Topical Response No. 1: EIR Process (see Section III.C, Topical Responses, of this Final EIR).
Comment Letter No. 8

Greater Toluca Lake Neighborhood Council
gtlnc@yahoo.com

North Hollywood – Toluca Lake Patch

Comment No. 8-1

Area residents raise a variety of concerns over the Draft Environmental Impact Report on NBC Universal’s expansion plan. Here are some of their comments.

The city and county of Los Angeles held a public meeting Monday at the Universal City Hilton for members of the public to respond to the Draft Environmental Impact Report findings about the NBC Universal Evolution plan. The plan for expansion and renovation of the Universal Studios space has been a source of controversy for traffic, environmental and other reasons.

On Dec. 11 and Dec. 12, Patch published interviews with representatives of NBC Universal and the expert who wrote the traffic section of the DEIR. This story will focus on speakers at the meeting who were opposed to the expansion.

Response to Comment No. 8-1

The introductory comments are noted and have been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft EIR are provided and responded to below.

Comment No. 8-2

Legal Issues

Before addressing the practical issues that construction and new development would cause for the area, some citizens believe it should be a legal matter.

“I believe that this project affects the entire city and it should appear on the ballot next March. All of the state voters will have a chance in the ways that they do to express their will. Heaven help the councilperson that opposes the will of the people regarding this project.” -George Andros (A 40-year North Cahuenga Boulevard resident and a former member of the L.A. Planning Commission, South Valley).

“I respectfully submit that the DEIR is legally inadequate and a revised DEIR must be prepared and circulated. It’s also procedurally deficient. This DEIR proposes an automobile-oriented development with significant and in some cases severe impacts. In the
DEIR, even when it recognizes the significance of the impacts is quick to declare the impacts ‘unavoidable,’ rather than make a good faith effort to fully evaluate feasible alternatives and mitigation measures or present a proposal that doesn’t have such an impact on the environment. Public Resources Code 21002.1, 21003.1 says the purpose of the DEIR is to provide the public detailed information about a project before it is approved. We are looking at a DEIR at the initial state to give us detailed information. This is woefully lacking in detailed information.” -Alan Dymond (president of the Studio City Residents Association)

Response to Comment No. 8-2

The Draft EIR presents a comprehensive assessment of the Project’s potential significant environmental impacts, identifies project design features and feasible mitigation measures that avoid and reduce the Project’s adverse environmental impacts, addresses a reasonable range of alternatives to the proposed Project, and, on an overall basis, informs the governmental decision-makers and the public regarding the Project’s potential short-term and long-term significant environmental impacts. In these ways, the Draft EIR achieves the basic objectives for CEQA review, as set forth in the CEQA Guidelines. (See CEQA Guidelines Sections 15121(a) and 15362.)

The comment raises a generalized concern regarding the legal adequacy of the Draft EIR, but provides no specific basis for proposing recirculation of the Draft EIR. Please refer to Topical Response No. 2: Adequacy of the Draft EIR (see Section III.C, Topical Responses, of this Final EIR), which provides a discussion of the applicable CEQA Guidelines and concludes that there is no basis under CEQA that requires the recirculation of the Draft EIR. The comment also raises a general concern regarding the CEQA process. The City of Los Angeles Department of City Planning, as described in the Draft EIR, is the Lead Agency for the Draft EIR and for purposes of complying with CEQA. The County of Los Angeles serves as a Responsible Agency and, pursuant to a Memorandum of Understanding between the City and County, worked jointly with the City in the preparation and evaluation of the EIR (see pages 4 and 6 of the Draft EIR). Consistent with the requirements of CEQA, the Draft EIR was prepared, submitted to the State Clearinghouse, Office of Planning and Research, and circulated for public review and comment.

The Project includes project design features and recommends mitigation measures described in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, that would reduce vehicle trips and vehicle miles traveled. For example, the Project would implement a Transportation Demand Management program that results in a decrease of daily vehicle trips. The commenter is referred to Topical Response 4: Transportation Demand
Management Program (see Section III.C, Topical Responses of this Final EIR), for further information regarding the proposed Transportation Demand Management program.

The potential traffic impacts of the Project are analyzed in Section IV.B.1. Traffic/Access – Traffic/Circulation, of the Draft EIR. An extensive series of project design features and mitigation measures have been identified to address the Project’s significant traffic impacts. While these measures would substantially reduce the Project’s traffic impacts, significant and unavoidable impacts would remain at nine intersections, six CMP freeway segments, two Project access locations, and with regard to potential neighborhood intrusion impacts. The commenter is referred to Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR for additional information regarding the potential traffic impacts of the Project and proposed project design features and mitigation measures.

Comment No. 8-3

NBC Universal Evolution Overlaps With MTA Expansion Plans

The NBC Universal Evolution plan covers some of the same area as a proposed expansion of the MTA station on Lankershim Boulevard.

“I would like to know which buildings in this DEIR are duplications of buildings that are included in the DEIR for the MTA site. If there is rooftop dining on top of a production building on this site, do you still need a production building on the MTA side with rooftop dining? Is the combination of noise from both dining areas considered? Should Universal not reconsider what it really needs and eliminate some of the building on the MTA side that is accounted for on this site? The MTA DEIR should be redone based on what is being built in the evolution plan and based on what Universal really needs, not on the basis of getting the maximum entitlements, surrounding communities be damned.” -Francesca Corra (Studio City resident and a director of Communities United for Smart Growth)

Response to Comment No. 8-3

As noted in the Project Description of the Draft EIR, the proposed Metro Universal project at the Universal City Metro Red Line Station site was an independent development project and is not part of the proposed Project. As such, pursuant to Section 15130 of the CEQA Guidelines, in this EIR, the proposed Metro Universal project was classified as a related project and per the CEQA Guidelines, was addressed in the analysis of cumulative impacts within each environmental issue included in Section IV, Environmental Impact Analysis, of the Draft EIR, including the noise analysis. (See page 269 of the Draft EIR.) The commenter is referred to Topical Response No. 3: Defining the Proposed Project (see Section III.C, Topical Responses, of this Final EIR), for additional information regarding the Metro Universal project.
Comment No. 8-4

Major Streets Missing From the DEIR

“It’s very perplexing to me that a major artery that connects the Westside to Universal directly, Wrightwood Drive, is not even in the study. It’s the street that comes directly down the hill on one side to Vineland, on the other side to Lankershim Boulevard. It’s not even there. We don’t even exist.” -Brian Sullivan (Wrightwood Drive resident)

Response to Comment No. 8-4

The Study Area used for the traffic analysis was determined based on consultation with the City of Los Angeles Department of Transportation, Caltrans, the County of Los Angeles Department of Public Works, and the City of Burbank Planning Department, and by reviewing the travel patterns and the potential impacts of Project traffic. The traffic Study Area is approximately 50 square miles in area and is generally bounded by Burbank Boulevard in the community of North Hollywood and the City of Burbank on the north, Santa Monica Boulevard in the City of West Hollywood and the community of Hollywood on the south, Forest Lawn Drive on the east, and Sepulveda Boulevard in the community of Sherman Oaks on the west, and includes all streets and neighborhoods within the Study Area, including Wrightwood Drive. (See Figure 42 on page 819 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR). Given the 50 square mile extent of the Study Area, not all streets within the boundaries of the Study Area were depicted on the figures. The Study Area was designed to ensure all potentially significantly impacted intersections, prior to any mitigations, were analyzed. The traffic Study Area was adjusted as necessary to confirm that there were no impacts at or outside the boundary of the Study Area.

Comment No. 8-5

Traffic Analysis Inaccurate

The traffic sections of the DEIR analyze present conditions at intersections and quantify the benefits of proposed improvements. However, some of the current data fell into question.

“It was almost as if It was written by people who have never driven the roads around here. They categorized the existing conditions at the intersections on Highland Avenue and Odin Street as level of service A, both morning and afternoon peak hours. Anybody who’s ever driven through them knows they’re level of service F due to the congestion that backs up from Highland and Franklin. Same thing on Cahuenga W at Oakcrest and Mulholland. They say they’re A and/or B. They’re both F because they’re backed up from Barham and Cahuenga.” -Michael Meyer (president of the Outpost Homeowner’s Association and board member of Communities United for Smart Growth)
Response to Comment No. 8-5

The comment refers to the traffic operations and Level of Service analysis conducted for the intersections of Highland Avenue & Camrose Drive (Intersection 64), Highland Avenue & Odin Street (Intersection 63), Oakcrest Drive & Cahuenga Boulevard (Intersection 49), and Mulholland Drive & Cahuenga Boulevard (Intersection 50). As noted in Section IV.B.1 of the Draft EIR and Chapter II of the Transportation Study, attached as Appendix E-1 to the Draft EIR, the analysis presented in the Transportation Study employs standard Los Angeles Department of Transportation (LADOT) policies and procedures that are used for all development proposals across the City of Los Angeles. According to LADOT policy, the study utilized the “Critical Movement Analysis—Planning” method of intersection capacity calculation to analyze signalized intersections. As part of the Transportation Study for the Project, traffic counts were completed to measure the traffic flow levels during the morning and afternoon peak hours. In addition, at the direction of the Los Angeles Department of Transportation, observations were made of traffic flow in the field and on the City’s closed circuit television system, and the Level of Service at a number of intersections was downgraded based on the observed performance.

The commenter’s description of the existing levels of service (LOS) at the referenced intersections is incorrect. The intersection of Highland Avenue & Odin (Intersection 63) is categorized as LOS B in the A.M. peak period under existing conditions. The intersection of Oakcrest Drive & Cahuenga Boulevard (Intersection 49) is categorized as LOS C in the A.M. peak period under existing conditions. The intersection of Mulholland Drive & Cahuenga Boulevard (Intersection 50) is categorized as LOS C in the A.M. peak period under existing conditions. Please refer to Table 20 on page 739 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR.

In addition, as shown in Table 39 on page 802 in Section IV.B.1 of the Draft EIR and Table 25 of the Transportation Study, the operating conditions (volume-to-capacity [V/C] ratios) at each of the intersections listed in the comment are lower (better) in the Future with Project with Funded Improvements scenario, with the Project and its transportation improvement and mitigation program, than those projected under the Future without Project conditions. Therefore, the Project’s transportation improvement and mitigation program not only mitigates the Project’s incremental impact at these locations to less than significant, but also improves the operating conditions at these intersections. Therefore, even if the intersections were operating at a lower (worse) Level of Service, the Project would not result in a significant impact at these locations.

Comment No. 8-6

“Presently, it could take anywhere from 25 to 45 minutes to drive 1.1 mile and that is from Pass Avenue to Blair Drive during peak hours. So I wonder if this project is approved, how
much longer would it take me to drive this 1.1 mile. This is something that you should check. You have to go out there during rush hour traffic to see how impacted we are. In the interest of better communication, I’m asking them to show us their criteria that the traffic consultants used to arrive at their trip calculations so that we can all have an opportunity to review it.” -Miriam Palacio (A 30-year resident of Blair Drive, board member of Hollywood Knolls Community Club and a member of Communities United for Smart Growth)

**Response to Comment No. 8-6**

The potential transportation impacts from the Project trips are analyzed in Section IV.B.1, Traffic/Access – Traffic/Circulation, and the Transportation Study included as Appendix E-1, of the Draft EIR. An extensive series of project design features and all feasible mitigation measures have been identified to reduce the Project’s significant traffic impacts. While these measures would substantially reduce the Project’s intersection level of service impacts, significant and unavoidable impacts would remain at nine intersections. The commenter is referred to Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR and the Transportation Study for a detailed discussion of Project traffic impacts throughout the Study Area and proposed project design features and mitigation measures.

Specifically, with regard to Barham Boulevard, which is the road between Pass Avenue and Blair Drive referenced in the comment, as shown in Figure 86 in Section IV.B.1, Traffic/Access – Traffic/Circulation, and Figure 59 of the Transportation Study, the Project does not result in any significant and unavoidable impacts along Barham Boulevard. As shown in Tables 39 and 40 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR and Tables 25 and 26 in Chapter V of the Transportation Study, the proposed transportation improvement and mitigation program mitigates the Project’s impacts along Barham Boulevard to a level below significance, based on the LADOT significance criteria. Specifically, the proposed Project mitigation for Barham Boulevard as described in Mitigation Measure B-5 in Section IV.B.1 of the Draft EIR mitigates the Project’s traffic impacts while alleviating traffic congestion along the Barham Boulevard corridor. In addition, as shown in Table 39 in Section IV.B.1 of the Draft EIR, the traffic operations (volume-to-capacity ratios) at the intersections along the Barham Boulevard corridor generally improve with the Project and the implementation of its proposed mitigation measures as compared to the Future without Project conditions. Further, as discussed in Section IV.B.1.5.b.(2)(a) of the Draft EIR, the Project is proposing a new public roadway “North-South Road” which would be built within the Mixed-Use Residential Area parallel to Barham Boulevard (see Project Design Feature B-2).

The traffic analysis presented in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR and the Transportation Study is based on the latest guidelines adopted by the Los Angeles Department of Transportation (LADOT) (Traffic Study Policies and
Procedures and the Los Angeles CEQA Thresholds Guide: Your Resource for Preparing CEQA Analyses in Los Angeles [City of Los Angeles, 2006]). Therefore the Project’s traffic impact analysis is consistent with the City’s adopted methodologies and consistent with those used for other developments in the City of Los Angeles.

The commenter is referred to Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR and the Transportation Study (see Appendix E-1 of the Draft EIR) that provides a detailed description of the Universal City Transportation Model’s development and validation process. The City of Los Angeles Department of Transportation examined and approved all the rates, parameters, and assumptions utilized in the model development, calibration, validation and application of the NBCU Model for use in the Project’s Transportation Study. (See the Los Angeles Department of Transportation’s Assessment Letter, Appendix E-2 to the Draft EIR.)

Comment No. 8-7

Traffic Is Bigger Than Just Intersections

Referring to figure 73B on page 904: “It shows that our local street’s traffic will not be affected. I challenge that finding as it makes no sense that there could be negative impacts on the north and south 101 and Cahuenga E and W but not on any of the feeder streets. It’s literally impossible. I live in the Hollywood Knolls which already suffers from tremendous cut-through traffic at all times of day and especially when any special event is held at Universal or the Hollywood Bowl. How will that problem be solved by 36,000 additional daily vehicle trips?” -Daniel Savage (Hollywood Knolls resident, president of Hollywood Knolls Community Club and a director of Communities United for Smart Growth)

Response to Comment No. 8-7

The comment incorrectly suggests that the Project will generate 36,000 daily trips. As shown in Table 36 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, the Project is forecasted to generate a net total of 36,451 daily trips on a typical weekday before considering trip reductions due to the proposed Transportation Demand Management Program and would generate a net total of 28,108 daily trips on a typical weekday after the implementation of the Transportation Demand Management Program described in Project Design Feature B-1. Those total trips would not all travel on any single roadway, but would be routed through the traffic Study Area.

The commenter refers to the analysis of the potential neighborhood intrusion or “cut through” traffic impacts of the Project. Section IV.B.1.3.d.(5) and Section IV.B.1.5.j of the Draft EIR provide a detailed analysis of the Project’s potential neighborhood intrusion impacts. The methodology used in this analysis is consistent with Los Angeles Department of Transportation guidelines and has been used and accepted for other major development.
projects in the City of Los Angeles. The methodology identifies those residential neighborhoods that might be significantly impacted by Project traffic according to Los Angeles Department of Transportation criteria for neighborhood streets. The Los Angeles Department of Transportation methodology identifies those locations where the Project generates enough traffic to result in a significant impact if all (or enough) of the Project traffic left the arterial/collector street system and used the local streets within a neighborhood. Three conditions must be present for the impact to be potentially significant:

a. There must be sufficient congestion on the arterial corridors to make motorists want to seek an alternate route,

b. There must be sufficient Project traffic on the route to result in a significant impact if it were to divert to a local street, and

c. There must be a street (or a combination of streets that provide a route) through the neighborhood that provides an alternate route.

On the basis of this analysis, nine neighborhoods were identified that may be subject to significant neighborhood intrusion impacts before implementation of the identified project design features and mitigation measures. With implementation of the Transportation Demand Management program and the recommended intersection mitigation measures, potential neighborhood intrusion impacts would remain for five neighborhoods. (See Figure 73B to the Draft EIR as revised in the Final EIR; see Correction and Addition IV.B.1.K, Section II, of the Final EIR.) With implementation of Mitigation Measure B-45 (Mitigation Measure B-42 in the Draft EIR) neighborhood intrusion impacts may be reduced to a less than significant level. However, as at this time it is not known whether consensus will be reached among the affected neighbors on the implementation of mitigation measures or if the agreed upon measures will reduce the impacts to less than significant, to be conservative, the Draft EIR concluded that mitigation of the potential neighborhood intrusion impact will not be feasible. Please also refer to Topical Response No. 7: Neighborhood Intrusion (see Section III.C, Topical Responses, of this Final EIR), for additional detail.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 8-8

“They go on and project that there’ll be impacts of the project on the Hollywood Freeway, Cahuenga west and east all down Highland and yet they say none of the traffic will seek an alternate route because there’s no alternate parallel route. Obviously they don’t understand how traffic works in the Cahuenga Pass because it doesn’t need a parallel
route. It uses all the winding streets that go through the hills and through all of our neighborhoods. They don’t even show that Outpost Dr. connects to Franklin.” -Michael Meyer

**Response to Comment No. 8-8**

As discussed in Section IV.B.1.3.d.(5) and Section IV.B.1.5.j, Traffic/Access – Traffic/Circulation, of the Draft EIR and Chapter VIII of the Transportation Study attached as Appendix E-1 to the Draft EIR a detailed analysis of the Project’s potential impacts on nearby residential neighborhoods was conducted. The methodology used in this analysis is consistent with the Los Angeles Department of Transportation (LADOT) guidelines and has been used and accepted for other major development projects in the City of Los Angeles. The LADOT methodology identifies those locations where the Project generates enough traffic to result in a significant impact if all (or enough) of the Project traffic left the arterial/collector street system and used the local streets within a neighborhood.

The Universal City Transportation Model includes Outpost Drive and accounts for the street’s connection to Franklin Avenue. Figure 4 on page 544 includes the connection referred to in the comment. As shown in Figure 4, the Project is expected to add approximately 130 daily trips to Outpost Drive. However, approximately 80 of these trips dissipate north of Hollywood Drive. Therefore, these trips represent local trips from the neighborhood instead of cut-through traffic. The remaining 50 trips are lower than the Los Angeles Department of Transportation’s significance threshold of 120 daily trips for neighborhood impacts. Hence the Project is not expected to have a significant impact on this street.

The commenter is also referred to Response to Comment No. 8-7 and Topical Response No. 7: Neighborhood Intrusion (see Section III.C, Topical Responses, of this Final EIR), for further detail.

**Comment No. 8-9**

**Some Traffic Improvements Are Not Feasible as Proposed**

Universal proposes to improve 139 intersections. Some residents believe its ideas, like widening Lankershim Boulevard to add a lane, might not be physically possible.

“I can’t imagine Lankershim widening. Everybody’s talking about widening Lankershim. How are you going to widen it? It’s not like there’s any land between. How are you going to do it? Are you going to tear down buildings? I don’t know how you can widen it. It’s a narrow street. I don’t see any way that this can actually happen without creating a horrible, horrible blockage both [sic] on Lankershim.” -Louise Spigel [sic] (Aqua Vista Street resident)
Figure 4
Neighborhood Intrusion Impact Analysis - Future With Project With Funded Improvements Scenario
Response to Comment No. 8-9

The proposed Lankershim Boulevard improvements are set forth in Mitigation Measure B-6, on pages 669–670 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, and depicted on Figure 52A, on page 265, of the Transportation Study, which is included as Appendix E-1 of the Draft EIR. As shown on Figure 52A, the east side of Lankershim Boulevard would be widened by approximately 4 to 8 feet between James Stewart Avenue and the Los Angeles River Flood Control Channel by using Project Site property. The west side of Lankershim would be widened by up to 10 feet south of the MTA driveway and south of Campo de Cahuenga by using existing sidewalk area and MTA property. The potential impacts of these improvements, including traffic impacts during construction and reduction in sidewalk widths, are discussed on pages 694–731 of the Draft EIR. Mitigation Measure B-6 would be implemented consistent with the Project’s transportation mitigation sub-phasing plan and the Project’s Mitigation Monitoring and Reporting Program.

Comment No. 8-10

“Additionally there is concern over mitigation measure B7 regarding the proposed widening of Forest Lawn Dr. At this point, Forest Lawn drive goes through Griffith Park, historic cultural landmark no. 942. Any changes in Griffith Park or Campo de Cahuenga must be approved by the Cultural Heritage Commission. The developers should not be permitted to ease the traffic jam that they created by funneling traffic through Griffith Park. To do so is a violation of Col. Griffith's intent when he donated the parkland to the city to provide an escape valve for the masses from the hustle and bustle of urban life. The project must not disturb the geography of Griffith Park, its wildlife or the tranquility of its visitors. This project is too massive, creates too much congestion and is located in an inappropriate place. It is ill conceived.” -Marian Dodge (president of the Federation of Hillside and Canyon Associations)

Response to Comment No. 8-10

The referenced Mitigation Measure B-7 provides, in part, for widening the Forest Lawn Drive northbound approach at Zoo Drive to provide two through lanes and a right-turn lane, widening the southbound approach and southbound departure at Zoo Drive to provide an additional through lane, widening the Forest Lawn Drive southbound approach and southbound departure at the Ventura Freeway eastbound ramps to provide an additional through lane and widening the Forest Lawn Drive southbound departure at the Ventura Freeway westbound ramps to provide an additional through lane. These segments of Forest Lawn Drive, Zoo Drive and the Ventura Freeway are within the northernmost boundaries of Griffith Park. Forest Lawn Drive is an existing Major Class II Highway. As shown on the Forest Lawn Layout exhibit presented in Appendix Q of the Transportation Study, the improvements are consistent with the Project’s transportation mitigation sub-phasing plan and the Project’s Mitigation Monitoring and Reporting Program.
Study (attached as Appendix E-1 to the Draft EIR), the recommended widenings would occur within the existing right-of-way of Forest Lawn Drive and Zoo Drive and would consist of a varied width of up to 10 feet of additional pavement within the right-of-way. The limited additional pavement within the existing right-of-way that would result from the implementation of Mitigation Measure B-7 and incremental increase in traffic volume along these roadways would not alter the existing wildlife movement patterns or use by visitors.

Further, the proposed Project is forecasted to generate a very limited number of additional vehicle trips through Griffith Park. These vehicle trips would occur within the existing roadways, including Forest Lawn Drive, Griffith Park Drive, Zoo Drive, the Ventura Freeway and the Golden State Freeway. The additional vehicle trips on these existing roadways from the Project represent a very small incremental increase in traffic volume along these roadways (see Appendix C of the Transportation Study which is attached as Appendix E-1 of the Draft EIR) and are not of a sufficient magnitude to alter use of the park by visitors or the sustainability of existing wildlife movement patterns in Griffith Park.

Griffith Park was designated as a Historical Cultural Monument in 2009. This is acknowledged as a correction and addition to the Draft EIR (see Correction and Addition No. IV.J.1.B, Section II, of this Final EIR). Project construction is confined to the Project Site, therefore, no direct impacts to the Griffith Park Historic Cultural Monument are anticipated. As discussed above, Mitigation Measure B-7 includes widening of portions of Forest Lawn Drive and Zoo Drive within the existing right-of-way. As the roadway improvements would occur within the existing right-of-way, no impact is anticipated to the character-defining features of the Griffith Park Historic Cultural Monument and, therefore, there would be a less than significant impact on the cultural monument.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 8-11

“What they are proposing is the closure of the Barham/Bennett off ramps. That would be a tragedy for anybody that lives in this neighborhood. They want to build a drop ramp southbound from their bridge onto the southbound Hollywood Freeway. Because of its closeness to the on and off ramps at Barham, otherwise known as Bennett, Caltrans is likely to close both of those ramps, which will be devastating not only to Cahuenga Pass, but for the people that come along Barham in the morning to go to work downtown and make a right turn onto Cahuenga and another right turn going southbound.” -Joan Luchs (Chairman of the, Federation of Hillside and Canyon Associations and president of the Cahuenga Pass Neighborhood Association)
Response to Comment No. 8-11

As provided in Mitigation Measure B-3, discussed on page 668 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR and updated in Correction and Addition No. IV.B.1.B, Section II, of this Final EIR, the Project Applicant or its successor shall construct a new southbound on-ramp to the Hollywood Freeway from Universal Studios Boulevard. Neither the Project nor proposed Mitigation Measure B-3 includes the closure of the existing Cahuenga Boulevard/Bennett Drive off-ramp. The determination to close any existing ramps would be made by Caltrans.

In addition to the analysis of the Project impacts with the new ramp constructed and both existing ramps at Bennett Drive remaining open, the Transportation Study also analyzes two other alternates for the ramp configurations. Appendix L to the Transportation Study, which is included as Appendix E-1 to the Draft EIR, provides an analysis of the following two additional scenarios: (1) the potential Project impacts in the event that the proposed southbound on-ramp to the Hollywood Freeway from Universal Studios Boulevard is not approved by Caltrans and (2) the existing Cahuenga Boulevard/Bennett Drive off-ramp is closed due to potential weaving issues resulting from its close proximity to the proposed southbound on-ramp at Universal Studios Boulevard. The commenter is referred to Appendix L to the Transportation Study for further information.

Comment No. 8-12

Shuttle Service Has No Long-Term Accountability

Universal is planning to include a shuttle service that will take people to and from the new Universal City to areas around Studio City, North Hollywood and Toluca Lake. However, some at the meeting pointed out that the DEIR only outlines a commitment to the shuttle service for 20 years.

“What happens to the various shuttles and such after the stipulated 20-year period? Do they just disappear like magic? Does another entity take them over? What happens to them? I see no provisions for their continuals. How can this be a mitigation? What if state and federal highway funds are not available to enact proposed freeway improvements? What happens? Does the region just suffer the massive traffic load and Universal just get off Scot free?” - Florence Blecher (A 30-year resident of Cahuenga Pass, president of the Cahuenga Pass Property Owners Association and a director of Communities United for Smart Growth)
Response to Comment No. 8-12

Pursuant to Mitigation Measure B-2, the Project would provide a local shuttle system which provides enhanced transit service for Project residents, visitors, employees, and the surrounding community, focusing on providing connections to key destinations such as the Universal City Metro Red Line Station, downtown Burbank, Burbank Media District, Hollywood, Universal CityWalk, and other nearby destinations. The shuttle system will be guaranteed for 20 years. It is anticipated that after 20 years, depending on ridership, the shuttle could be integrated into a public transportation system service. The shuttle systems, routes, stops, headways, and hours of operation shall be reviewed periodically and may be modified with LADOT approval. Please refer to Topical Response No. 5: Transit Mitigation (see Section III.C, Topical Responses, of this Final EIR) for further information regarding the proposed shuttle system.

It is not clear to what state and federal highway funds the comment refers. The Project would be required to implement all of the project design features and mitigation measures, including freeway improvements, required as part of the Project's approvals. The recommended mitigation measures include, for example, a new US 101 southbound on-ramp at Universal Studios Boulevard (see Mitigation Measure B-3 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR); US 101 interchange improvements at Universal Terrace Parkway (Campo de Cahuenga Way) (see Mitigation Measure B-4 in Section IV.B.1 of the Draft EIR); and specific intersection improvements at freeway ramp locations that have been identified in Section IV.B.1 of the Draft EIR and Chapter V of the Transportation Study.

In addition, as noted in Appendix O of the Transportation Study (see Appendix E-1 of the Draft EIR), the Applicant has worked with Caltrans to identify the US 101 regional freeway improvements that would provide benefits to the regional transportation system. Since these US 101 corridor regional improvements currently do not have committed funding, the analysis presented in Section IV.B.1 of the Draft EIR conservatively assumes that these regional improvements would not be in place in the year 2030. The Project has proposed to fund the environmental documents for the proposed US 101 Corridor regional improvements described in Appendix O of the Transportation Study (see Appendix E-1 of the Draft EIR).

This funding and documents would assist Caltrans in getting the proposed improvements “ready for State and Federal funding. However, as noted in Appendix O of the Transportation Study, the Project’s traffic impact analysis does not account for any benefits from the proposed US 101 regional improvements. Therefore, the significant traffic impacts noted in the Draft EIR do not account for benefits resulting from the implementation of the regional improvements described in Appendix O of the
Transportation Study. Please also refer to Caltrans’ traffic assessment letter dated February 3, 2011, and Topical Response No. 6: Freeway Improvements (see Section III.C, Topical Responses, of this Final EIR), for additional detail regarding freeway improvements.

Comment No. 8-13

Budget for Traffic Improvements

NBC Universal proposes to pay for many public traffic improvements, but not all, according to the DEIR.

“Many of the mitigations that are called for are supposed to be funded publicly: city, county and state funded. Well, as we all know, our city and our state at least don’t have any money. We’re out of money and that may well be true for the county too. How are the taxpayers supposed to pay for the widening of Lankershim Avenue so that Universal can have this massive new project? Are we going to fire more police officers? Are we going to close more libraries and parks?” -Ronald Taylor (Studio City resident)

“They go on to project future conditions adding in traffic improvements that have no funding, such as the widening of Highland and Franklin, the widening of Cahuenga and Barham, the widening of Odin at Cahuenga. These things have no funding. They should not be in the base of future conditions.” -Michael Meyer

Response to Comment No. 8-13

As required by CEQA Guidelines Section 15151, the Draft EIR provides decision-makers with a sufficient degree of information and analysis for a project of this scope to enable them to make a decision which intelligently takes account of the Project’s environmental consequences. Consistent with CEQA Guidelines Section 15147, the information contained in the Draft EIR included summarized technical data, maps, diagrams, and similar relevant information sufficient to permit a full assessment of significant environmental impacts by reviewing agencies and members of the public.

With regard to funding of the recommended mitigation measures, the Project would be required to implement all of the mitigation measures required as part of the Project’s approvals.

As mentioned in Chapter III of the Transportation Study, the future base roadway improvements were compiled based on information provided by LADOT, the County of Los Angeles Department of Public Works (LACDPW), and the City of Burbank. At the time of the preparation of the traffic impact analysis for the Draft EIR and Transportation Study, these jurisdictions confirmed that all of the future base roadway improvements listed in
Table 27 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR and Table 11 of the Transportation Study had firm funding commitments to be built by the year 2030.

Highland Avenue & Franklin Avenue (Intersection 65)—The comment states that the proposed widening of Highland Avenue is currently not funded. This is incorrect since the proposed improvement assumed at this intersection under the future base conditions has already been built. The Existing Conditions analysis did not include this improvement as it was not in place at the time the traffic counts were conducted at this location.

Cahuenga Boulevard & Barham Boulevard (Intersection 47)—As noted above, at the time of the preparation of the Transportation Study, LADOT confirmed that all of the future base roadway improvements listed in Table 27 of the Draft EIR and Table 11 of the Transportation Study have firm funding commitments to be built by the year 2030. However, based on recent direction from LADOT, it has been determined that this improvement is on hold pending further discussions with Caltrans. Therefore, in the event that this assumed base roadway improvement is not implemented prior to the time required by the Project’s transportation improvement subphasing plan, the Applicant shall fund the widening of the westbound approach of Cahuenga Boulevard (West) to provide one through lane and one right-turn only lane in the event that funding for its implementation is unavailable. (See Correction and Addition No. IV.B.1.A, Section II, of this Final EIR.)

Odin Street & Cahuenga Boulevard (Intersection 67)—As noted above, at the time of the preparation of the Draft EIR and the Transportation Study, LADOT confirmed that all of the future base roadway improvements listed in Table 27 of the Draft EIR and Table 11 of the Transportation Study have firm funding commitments to be built by the year 2030. It should be noted that LADOT has already implemented part of the future base improvement at this location since the preparation of the Existing Conditions analysis in Section IV.B.1 of the Draft EIR. However, based on recent direction from LADOT, it has been determined that the remaining improvement is on hold pending further discussions with Caltrans. Therefore, in the event that this assumed base roadway improvement is not implemented prior to the time required by the Project’s transportation improvement subphasing plan, the Applicant shall fund the assumed base improvement in the event that funding for its implementation is not available. (See Correction and Addition No. IV.B.1.A, Section II, of this Final EIR.)

**Comment No. 8-14**

**Lack of Mitigation Efforts**

NBC Universal does offer to make traffic improvements and compensate for added tourism, shopping, business and residents. However, some feel the DEIR avoids making specific commitments:
“When I look at the DEIR I see there’s a lot of analysis of the potential impacts but not a lot of description of the actual mitigation efforts. In ‘Noise,’ one of the things that could be done ... would be to model, to use computer simulation modeling, to show how the impact of the sizes of the buildings against the generating noises of the theme park, what would be the consequence.” -Peter Hartz (president of the Toluca Lake Homeowner’s Association)

Response to Comment No. 8-14

As explained in Section IV, Environmental Impact Analysis, of the Draft EIR, the analysis of each environmental subject area is organized into six subsections, including a subsection that lists the specific project design features that were incorporated in the analysis of the Project’s potential impacts and, when applicable, mitigation measures that have been identified to reduce the Project’s significant impacts to the extent feasible.

The Draft EIR analysis of potential noise impacts of the Project did include computer simulation modeling. As explained in Section IV.C, Noise, of the Draft EIR, the primary noise model used to calculate future Project noise levels was the LimA Noise Model. The LimA Noise Model used in the impacts analysis included building structures, terrain, and sound sources. In order to accurately represent surrounding conditions, a three-dimensional replica of the Project Site was entered into the software, which included proposed changes to the Project Site topography that could occur as a result of the Project. Based on the noise analysis, the Draft EIR concluded that the Project’s operational noise will result in less than significant impacts during both daytime and nighttime hours, with nighttime noise levels falling well below the significance threshold in most instances. The new Project operational sound sources would be in compliance with the proposed Specific Plan regulations and would not result in a significant impact in any of the receptor areas. Importantly, the proposed City and County Specific Plans’ sound attenuation requirements incorporate the Los Angeles Municipal Code and Los Angeles County Code noise regulations, respectively. Therefore, no additional mitigation measures are required to reduce operational noise impacts.

Comment No. 8-15

Should Locals Believe the Report?

Some speakers encouraged skepticism at the promises that are made in the DEIR.

“If you Google ‘Universal Studios Fires’ you'll find the reporting from back in the ‘90s. Executives at Universal convinced the community and your committee and the city officers that the water pressure problem had been solved after that tremendous fire. Just a couple of years ago, there was another fire. The first department could not put it out because there was no water pressure. The Universal executives have a credibility problem.” -Michael McCue (Studio City resident and a former Studio City Neighborhood Council member)
“I’ve been sitting on this board for 5 and a half years. The one thing I’ve observed over the years, people come in and they say they’re going to do something. Then I go to see the building after it’s built. Lo and behold, not everyone has told the truth and people get away with things. That’s on a very small scale. I just am deeply concerned that we give Mulholland Design Review Board the right to review the plans so that the people can come to our meeting in Van Nuys and have their say.” - Joan Krieger-Hoffman (Vice chair of the Mulholland Design Review Board and a partner in Fred Hoffman Architecture)

“A good neighbor respects their neighbor across the fence. What I’ve seen in my short time here is Universal does what’s good for them. Halloween [Horror] Night is a profit-generating program, makes millions of dollars for Universal and for years the residents of Hollywood Manor have been asking them to stop. It continues to this day 100 feet from our property, going on well past midnight. That’s just one sample of the kind of respect Universal has for its neighbors. This plan again is disrespectful to its neighbors.” - Jason Goldklang (resident of Blair Drive)

Check at http://northhollywood.patch.com/articles, for more information on the public hearing, including Los Angeles City councilman Tom LaBonge’s comments.

Response to Comment No. 8-15

With regard to the June 1, 2008, fire on the Project site, although there were initial reports regarding a lack of adequate fire flow, the County Fire Department studied the response to the fire and concluded that sufficient fire flow was available and exceeded requirements. Characteristics of the fire such as intensity and speed restricted the placement of fire engines and hose line deployment, which affected the delivery of water, but availability of fire water was not an issue, according to the County Fire Department. (See Appendix FEIR-11 of this Final EIR.)

As detailed in the Draft EIR, future developments within the County portions of the Project Site would be required to comply with the County Fire Department fire flow requirements and future developments within City portions of the Project Site would be required to comply with the City of Los Angeles Fire Department fire flow requirements. As part of the Project, a new fire protection system would be installed to support the potential fire flow demand in the Mixed-Use Residential Area of the proposed Project. New service lines would be constructed to serve the proposed Project. In evaluating the water system, the new on-site water lines would be sized for both fire demand and peak day domestic demand. (See Project Design Feature L.2-1, page 1881 in Section IV.L.2, Utilities – Water, of the Draft EIR.) All water lines constructed as part of the Project that deliver both domestic and fire water would be constructed with the necessary materials and appropriate size to deliver the highest instantaneous demand on the individual water line pursuant to Project Design Feature L.2-2. (See page 1881 of the Draft EIR.) Further, with
implementation of Mitigation Measure L.2-1, which would augment the existing DWP infrastructure through the provision of an on-site pumping station in the Mixed-Use Residential Area with a capacity of up to a maximum of 16,500 gallons per minute, impacts with respect to fire protection infrastructure in the City would be reduced to a less than significant level.

Further, pursuant to Project Design Feature K.1-11, a drafting reservoir and drafting appliances would be provided and maintained in the County portion of the Project Site with the ability to draft 1.5 million gallons of water designed to the satisfaction of the Los Angeles County Fire Department. (See page 1719 in Section IV.K.1, Public Services – Fire Protection, of the Draft EIR.) As explained in the Public Services – Fire Protection Section of the Draft EIR, with implementation of the project design features and recommended mitigation measures, Project impacts with respect to fire protection in the County would be less than significant. (See page 1721, Section IV.K.1, of the Draft EIR.)

The Project proposes revising the boundaries of the Mulholland Scenic Parkway Specific Plan to remove the small portion of the southeastern-most tip of the Project Site that is currently located within the Outer Corridor of the City’s Mulholland Scenic Parkway Specific Plan. The area that is the subject of this request totals less than 2 acres (or approximately 0.5 percent of the 391-acre Project Site) and is proposed to be included within the proposed Universal City Specific Plan area in order to create unified and coherent regulations for all portions of the Project Site to be located within the City.

For informational purposes, the Mulholland Scenic Parkway Specific Plan area is divided into two areas – the Inner and Outer Corridors. The boundaries of these corridors are determined via distance from the Mulholland Scenic Parkway right-of-way, with the outermost boundary of the Outer Corridor extending 0.5 mile outward from the Mulholland Drive right-of-way. Mulholland Drive reaches its eastern terminus in the Project area where it turns from a primarily east-west road to a north-south road as it connects with Cahuenga Boulevard. Based on these conditions, the strict application of the Outer Corridor boundary places the eight-lane Hollywood Freeway and areas on the north (far) side of the Freeway within the boundaries of the Mulholland Scenic Parkway Specific Plan (see Figure 28 on page 433 of the Draft EIR). As concluded on page 525 of the Draft EIR in Section, IV.A.1, Land Use – Land Use Plans/Zoning, since the context of the Project Site is dominated by the Hollywood Freeway and is not contiguous with other areas within the Mulholland Scenic Parkway Specific Plan Outer Corridor, land use impacts with respect to the intention of the Mulholland Scenic Parkway Specific Plan to preserve the visual quality of natural open space would be less than significant. The analysis goes on to further conclude that the proposed Project would not be inconsistent with existing Mulholland Scenic Parkway Specific Plan policies to preserve the existing residential character of areas along and adjoining the Mulholland Drive right-of-way, to protect all identified archaeological and
paleontological resources, and to assure that land uses are compatible with the parkway environment. Therefore, the impact of the Project with respect to the Mulholland Scenic Parkway Specific Plan policies and regulations for the Outer Corridor are concluded in the Draft EIR to be less than significant.

The Draft EIR presents a comprehensive assessment of the Project's potential significant environmental impacts, including impacts from construction. The commenter is referred to Section IV, Environmental Impact Analysis, of the Draft EIR for details concerning analysis of potential Project impacts and proposed project design features and mitigation measures.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment Letter No. 9

City of Los Angeles Department of Water and Power
Charles C. Holloway
Manager, Environmental Assessment
Charles.Holloway@ladwp.com

Comment No. 9-1

Thank you for including the Los Angeles Department of Water and Power (LADWP) in the environmental review process for the NBC Universal Plan (the Project).

After having reviewed the document, some of the Department’s comments and input, with regard to the technical aspects of construction of the new Distribution Station that will service the Project, and the impacts of the Project’s water and power needs on LADWP utilities have been incorporated into the Draft EIR.

However, it appears that LADWP’s previous comment letter, sent on the 29th of September, 2008, did not make it into the document.

We are hereby resubmitting the original comment letter for inclusion into the document and, after having further reviewed the document, are including additional comments – coordinated with the Water Resources Group and the Power Systems Engineering Services divisions of LADWP.

We request that our comments for changes and inclusions be addressed in the Final EIR, and look forward to reviewing your environmental document for the Project. Please continue to include LADWP in your mailing list and address it to the undersigned in Room 1044. If there are any questions, please contact Mr. Michael Mercado of my staff at 213-367-0395.

Response to Comment No. 9-1

The introductory comments are noted and have been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the environmental analysis in the Draft EIR are provided and responded to below.

It should be noted that the September 29, 2008, letter referenced in the comment was submitted to the City regarding the Draft EIR for the Metro Universal Project, which was a different project from the proposed NBC Universal Evolution Plan project that is the subject of this Final EIR. The Draft EIR Circulation Period for this Project occurred from November 4, 2010, to February 4, 2011.
Comment No. 9-2


   - Suggest changing to “Applicant” that would enter into an agreement with the DWP, not the Project

Response to Comment No. 9-2

The comment’s suggestion to change “Project” to “Applicant” with respect to the party that would enter into an agreement with the Los Angeles Department of Water and Power has been incorporated into the Final EIR (see Correction and Addition Nos. I.A and I.B, Section II, of the Final EIR).

Comment No. 9-3

2. Section I.E.12.(b)(4)(i), p. 219,
   Section I.E.15.(d)(1), pp. 253-254,
   Section IV.L.2.3.c(2)(a), pp. 1871-1872,
   Section IV.L.2.5.a, pp. 1881-1882,
   Section IV.O.3.d(2)(b), pp. 2127-2128, and
   Section IV.O.5, p. 2136-2137
   - Match the water conservation measures identified by the Applicant in the Water Conservation Commitment Letter dated October 30, 2009 (Appendix E of the Water Supply Assessment, Water Supply Assessment is Appendix N-1-2 of the DEIR)

Response to Comment No. 9-3

The comment suggests that the water conservation Project Design Features included in the Draft EIR be consistent with the water conservation measures identified by the Applicant in the October 30, 2009, Water Conservation Commitment Letter, attached as Appendix E to the Water Supply Assessment in Appendix N-1-2 of the Draft EIR. Revised water conservation Project Design Features have been incorporated into the Final EIR (see Correction and Addition Nos. IV.L.2.G, IV.L.2.H, IV.L.2.I, IV.L.2.M, IV.L.2.N, IV.L.2.O, IV.O.MM, IV.O.OO, IV.O.VV, IV.O.WW and IV.O.XX, Section II, of the Final EIR). With respect to items required by City Ordinance No. 180822, the Applicant will comply with City Ordinance No. 180822, as applicable.
Comment No. 9-4


- Project Design Feature L. 2-4 should state "... by acquiring for the Department of Water and Power water rights in the Central and/or West Coast Basins ..."

Response to Comment No. 9-4

The comment’s suggestion to clarify that water rights may be acquired for the Department of Water and Power in either or both the Central and/or West Coast Basins has been incorporated into the Final EIR (see Correction and Addition No. IV.L.1.P, Section II, of the Final EIR).

Comment No. 9-5

4. Section III.A.12.b, p. 369

- An acronym MWD may be assigned to Metropolitan Water District of Southern California, and be used throughout the DEIR.

Response to Comment No. 9-5

The comment suggests that an acronym (“MWD”) may be assigned to the Metropolitan Water District of Southern California for use throughout the Draft EIR. As not all readers of the Draft EIR may be familiar with the various acronyms that could be used in an EIR, the use of acronyms was minimized. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 9-6

5. Section III.A.12.b, p. 369

- DWP operates the Los Angeles Aqueduct, not the Los Angeles Owens River Aqueduct.

Response to Comment No. 9-6

The comment’s clarification that the Department of Water and Power operates the Los Angeles Aqueduct, as opposed to the Los Angeles-Owens River Aqueduct, has been incorporated into the Final EIR (see Correction and Addition No. III.A, Section II, of the Final EIR).
Comment No. 9-7

6. Section IV.A.1.3.c(2), p. 449

- The acronym “City” is already assigned to City of Los Angeles. Please assign a different acronym for Universal City.

Response to Comment No. 9-7

The comment regarding the reference to the proposed Universal City Specific Plan is noted and the requested change has been incorporated into the Final EIR. (See Correction and Addition No. IV.A.1.A, Section II, of the Final EIR.)

Comment No. 9-8

7. Section IV.G.2.2.b(1)(a), p. 1408, etc.

- There are numerous statements made regarding the possibility of the project requiring temporary and/or permanent dewatering. There are also numerous statements made that “the majority of the Project Site is in the eastern Santa Monica Mountains which is not part of the Basin or considered to be non-water bearing”. These statements imply that the Project Site does not contribute groundwater flows to the San Fernando Basin. The Los Angeles Department of Water and Power (LADWP) does not agree with these statements and strongly believes that any groundwater under the Project Site does indeed ultimately end up in the San Fernando Basin. As per the 1979 San Fernando Judgment, Los Angeles has a prior and paramount right to all of the surface waters of the Los Angeles River and native groundwater in the San Fernando Basin. As such, any dewatering that takes place on the Project Site must be metered, quantities reported to the Upper Los Angeles River Area Water Master and LADWP, and LADWP must be financially compensated for any consumptive use associated with the dewatering and subsequent discharge to the sanitary sewer or storm drain system.

Response to Comment No. 9-8

As described in the Project Site Conditions of the groundwater analysis (beginning on page 1410 of the Draft EIR), the majority of the Project Site is in the eastern Santa Monica Mountains, which is not part of the Basin. Portions of the Project Site considered to be within the Basin include the northwestern area and a narrow portion of the Project Site along the Los Angeles River Flood Control Channel. The Project Site is located in an area with large variations in elevation. Shallow groundwater is encountered along the Los Angeles River Flood Control Channel adjoining the northern portion of the Project Site.
Under the remainder of the Project Site, groundwater is limited to joints and fractures in the bedrock materials. Additionally, the Topanga geologic formation beneath a majority of the Project Site is considered non-water bearing, as it does not yield notable quantities of water available for extraction wells. Recent Alluvium (Qal) located north, west, and in a small area along the southwest edge of Universal City and the Project Site (in the area along the 101 freeway) is considered to be water bearing. In the vicinity of the Project Site, simulated groundwater contours associated with the Basin, produced by using the San Fernando Basin Groundwater Flow Model, ranged from approximately 480 to 490 feet above mean sea level. Groundwater elevations measured at the Project Site (in 2005 and 2006) ranged from approximately 512 to 697 feet above mean sea level; therefore, groundwater found beneath a majority of the Project Site is not considered to be hydrologically connected with the Basin.

As further noted in Section IV.G.2, Water Resources – Groundwater, of the Draft EIR, based on the historical high, groundwater in parts of the Project Site has been estimated as close to the surface as 15 feet below ground surface. Therefore, as discussed in the Draft EIR, portions of the Project could encounter groundwater during construction and could require dewatering activities associated with construction. No permanent dewatering systems are anticipated with development of the proposed Project. However, if below ground structures associated with the Project extend into the groundwater table (e.g., subterranean parking), those structures may require permanent dewatering systems. If a dewatering system is necessary, it would be designed and operated in accordance with all applicable regulatory and permit requirements. For additional discussion of the potential impacts from construction and operational dewatering refer to Section IV.G.2.b, Water Resources – Groundwater, of the Draft EIR.

Comment No. 9-9

8. Section IV.L.2.1, p. 1853

- Delete the word “Technical” in front of Appendix N-1-1.
- Paragraph 2 - “In case of water, there are two kinds of supply sources: natural resources and reclamation (or recycled water).” - This statement is true for City of LA. Either specify that the supply of sources are for the City of LA, or include desalination as a third possible source of supply if the statement is a general statement for any location.

- Paragraph 2 - “Recycled water is non-potable, and must be conveyed in a separate system from potable water to avoid the possibility of direct human consumption” - This statement is currently true for the City of LA. If the statement is a general statement for any location, include another possible use of recycled
water, which is to send the advanced treated recycled water to spreading basins to percolate underground for later use.

**Response to Comment No. 9-9**

The comment’s suggestion to delete the word “Technical” in front of Appendix N-1-1 has been incorporated into the Final EIR (see Correction and Addition No. IV.L.2.A, Section II, of the Final EIR). The comment’s clarification that there are two types of water supply sources for the City of Los Angeles but that desalination is a third possible source of supply for other locations and that another possible use for recycled water in locations other than the City of Los Angeles is to send advanced treated recycled water to spreading basins to percolate underground for later use are noted and have been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 9-10**

9. Section IV.L.2.2.b(1), p. 1855

- LADWP has “one of the” rather than “the” major allocation or entitlement of the water imported by the Metropolitan Water District.

**Response to Comment No. 9-10**

The comment’s clarification that LADWP has “one of the” rather than “the” major allocation or entitlement of the water imported by the Metropolitan Water District has been incorporated into the Final EIR (see Correction and Addition No. IV.L.2.B, Section II, of the Final EIR).

**Comment No. 9-11**

10. Section IV.L.2.2.b(1)(c), p. 1859

- Delete the extra “.”

**Response to Comment No. 9-11**

The suggestion to delete an extra period in the text of the Draft EIR is noted and has been incorporated into the Final EIR (see Correction and Addition No. IV.L.2.C, Section II, of the Final EIR).

**Comment No. 9-12**

11. Section IV.L.2.2.b(3), p. 1860

- For the first sentence, use a period instead of a comma.
Response to Comment No. 9-12

The suggestion to use a period instead of a comma in the text of the Draft EIR is noted and has been incorporated into the Final EIR (see Correction and Addition No. IV.L.2.D, in Section II of this Final EIR).

Comment No. 9-13

12. Section IV.L.2.2.c, p. 1862

- “According to the 2005 Urban Water Management Plan, approximately ... 28,500, not 28,000, acre-feet per year of recycled water is used for environmental enhancement and recreation in the Sepulveda Basin ... “See pg 3-21 of 2005 UWMP.

- “... and approximately 34,000 acre-feet per year of recycled water is sold to the West Basin Municipal Water District, not to the Metropolitan Water District.” See pg 3-21 of 2005 UWMP.

Response to Comment No. 9-13

The comment’s clarification that according to the 2005 Urban Water Management Plan, approximately 28,500 (rather than 28,000) acre-feet per year of recycled water is used for environmental enhancement and recreation in the Sepulveda Basin has been incorporated into the Final EIR. Also, the comment’s clarification that approximately 34,000 acre-feet per year of recycled water is sold to the West Basin Municipal Water District (rather than the Metropolitan Water District) has been incorporated into the Final EIR (see Correction and Addition No. IV.L.2.E, Section II, of the Final EIR).

Comment No. 9-14

13. Section IV.L.2.3.a, p. 1868

- The future daily water demand flows for the Project were determined based on Sewage Generation Factors, provided by the City of Los Angeles Bureau of Sanitation, rather than based on water generation factors, provided by City of Los Angeles Bureau of Engineering.

Response to Comment No. 9-14

The comment’s clarification that future daily water demand flows for the Project were determined based on City of Los Angeles Bureau of Sanitation Sewage Generation Factors rather than generation factors for water service provided by the City’s Bureau of
Engineering has been incorporated into the Final EIR (see Correction and Addition No. IV.L.2.F, Section II, of the Final EIR).

**Comment No. 9-15**

14. Section IV.L.2.3.d(2)(a), p. 1874

- The forecasted domestic water consumption for the proposed Project is based on City of Los Angeles Bureau of Sanitation Sewage Generation Factors, rather than City of Los Angeles Bureau of Engineering average daily flow factors.

**Response to Comment No. 9-15**

The comment’s clarification that the forecasted domestic water consumption for the Project was determined based on City of Los Angeles Bureau of Sanitation Sewage Generation Factors rather than average daily flow factors provided by the City’s Bureau of Engineering has been incorporated into the Final EIR (see Correction and Addition No. IV.L.2.J, Section II, of the Final EIR).

**Comment No. 9-16**

15. Section IV L.4.6(g) [sic], p. 1961

The following passage would complement the issues being discussed in this section of the document, as it deals with environmental safety issues:

- The facility would be designed with automatic circuit breakers and other safeguards to prevent eventful failures including an extremely low-probability accidental explosion. The approximately 12-16 foot high concrete walls surrounding the facility would resist an accident inside the station from affecting surrounding areas outside the station boundaries. This station does not involve the use of hazardous substances during its construction or operation. During operation, batteries would be used for backup power and would contain acid gel sealed within the battery enclosure. Transformers would contain mineral oil and circuit breakers would contain nontoxic sulfur hexafluoride (SF6) gas. The station will not contain PCB fluids and no hazardous wastes would be stored onsite. Additionally, DWP has Spill Prevention Control and Countermeasure plans to prevent and contain oil releases, and conducts internal audits of its facilities to insure compliance. Pedestrians and vehicle traffic would be kept a safe distance away from construction zones via markers, barriers, and sign postings.
Response to Comment No. 9-16

The additional information from the Los Angeles Department of Water and Power regarding environmental safety issues associated with the proposed new distribution station on or near the Project Site pursuant to Project Design Feature L.4-3 has been incorporated into the Final EIR (see Corrections and Additions No. IV.L.4.R, Section II, of the Final EIR).

Comment No. 9-17


- “It is anticipated that through these conservation features (Project Design Features on pages 218-220 of DEIR) the proposed Project would reduce potable water consumption by approximately 20 percent:” One of the Project Design Features is use of RW for irrigation. If the 20% reduction was estimated by just accounting for RW use, then the estimate is correct (246 AFY RW/1249.1 AFY total ~ 20% reduction). However page 1875 of DEIR goes on to reference Appendix Q Global Warming (prepared by CTG Energetics, Inc.) for additional information. Page 32 of Appendix Q states that the proposed indoor water conserving fixtures will reduce potable water consumption by approximately 20%. These two sections conflict in how the 20% reduction is being achieved, please clarify.

Response to Comment No. 9-17

As indicated in the comment, Section IV.L.2, Utilities – Water, of the Draft EIR cross-references the Climate Change Technical Report prepared by CTG Energetics, 2010, included as Appendix Q to the Draft EIR for an explanation of the estimated 20 percent reduction in potable water consumption based on the project design features. Contrary to the suggestion in the comment, the estimated 20 percent reduction is not based on the use of recycled water for irrigation. As explained in Appendix Q, the 20 percent reduction in potable water use applies to the indoor domestic water usage. The “Project scenario assumes a 20 percent reduction from domestic, potable water (60 percent of the ‘Development Total’) based on the project design features included in Section IV.L.2, Utilities – Water, of the Draft EIR” (see page 20 of Appendix A of the Climate Change Technical Report which is presented as Appendix Q of the Draft EIR). The 20 percent reduction in potable water use was derived from inputting specified fixtures into the “Typical Building Water Conservation Measures” model created by the U.S. Green Building Council and CTG Energetics (see page 22 of Appendix A of the Climate Change Technical Report which is presented as Appendix Q of the Draft EIR). The 20 percent reduction does not
apply to outdoor potable water use, nor to non-domestic, indoor potable water use. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 9-18**

17. Section IV.L.2.4, p. 1881

- Suggest revision stating that the Applicant would enter into an agreement with the DWP, not the Project.

**Response to Comment No. 9-18**

The comment’s suggestion to change “Project” to “Applicant” with respect to the party that would enter into an agreement with the Los Angeles Department of Water and Power has been incorporated into the Final EIR (see Corrections and Additions No. IV.L.2.L, Section II, of the Final EIR).

**Comment No. 9-19**

18. Section IV.L.2.3.d(2)(a), p. 1877

- Suggest revision stating that the Applicant would enter into an agreement with the DWP, not the Project.

**Response to Comment No. 9-19**

The comment’s suggestion to change “Project” to “Applicant” with respect to the party that would enter into an agreement with the Los Angeles Department of Water and Power has been incorporated into the Final EIR (see Correction and Addition No. IV.L.2.K, Section II, of the Final EIR).

**Comment No. 9-20**

19. Section IV.L.2.5.b, p. 1883

- Mitigation Measure L. 2-1 should read: “Prior to issuance of subdivision map clearance by Los Angeles DWP, The Project Applicant or its successor shall pay the full cost to design and construct a pump station with a capacity able to meet the project’s expected domestic and fire flow demands. The pump station is expected to be located within the southwest portion of the project site ... “
Response to Comment No. 9-20

The comment suggests revising the point at which the Project mitigation measure requiring a pump station is implemented to be prior to final subdivision map clearance by Los Angeles DWP. Per the comment’s suggestion, Mitigation Measure L.2-1 has been revised to require that the Applicant fund or guarantee the Project’s contribution to the costs to construct the pump station prior to recordation of the final map for the Mixed-Use Residential Area (see Correction and Addition No. IV.L.2.R, Section II, of the Final EIR). The comment’s suggestions that the Applicant provide the full cost to design and construct the pump station with a maximum capacity to serve the Project’s needs, rather than provide the proportionate contribution of costs attributable to the proposed Project for a pumping station with a capacity of up to a maximum of 16,500 gallons per minute, are noted and have been incorporated into the Final EIR for consideration by the decision-makers prior to taking any action on the proposed Project. It should be noted that the comment suggests that the pump station is expected to be located within the southwest portion of the Project Site; however, as specified in the Draft EIR in Mitigation Measure L.2-1, the pumping station is expected to be located within the southeastern portion of the Mixed-Use Residential Area of the Project Site (see page 1883 of the Draft EIR).

Comment No. 9-21

20. Section IV L.4.6(i) [sic], p. 1962

Seismic activity, fault location, type, and activity appear to have been discussed as part of the Geotechnical Surveys and in the impacts to the construction and operation of the Distributing Station that will serve the local area, including the Project. The following statement should complement the statements with regard to reducing impact to the Station:

- Additionally, distributing station equipment is designed to withstand severe seismic activity. If extreme seismic activity causes damage to station equipment, the station’s concrete walls would resist an eventful failure affecting the surrounding area outside the station boundaries. Additionally, LADWP has emergency response plans to protect the public and the environment if such an event should occur.

Response to Comment No. 9-21

As the comment notes, seismic activity, fault location, type, and activity have been discussed as part of the geotechnical analysis for the Project, which includes the construction and operation of a proposed new Los Angeles Department of Water and Power distribution station on or near the Project Site, as set forth in Project Design Feature L.4-3 (see page 1952 of Section IV.L.4, Utilities – Water, of the Draft EIR). The additional
information from the Los Angeles Department of Water and Power regarding the less than significant geotechnical impacts associated with the new distribution station has been incorporated into the Final EIR (see Correction and Addition No. IV.L.4.S, Section II, of the Final EIR).

**Comment No. 9-22**

21. Appendix N-1-1

- Water Technical Report: Applicable comments noted above also apply to this Water Technical Report.

**Response to Comment No. 9-22**

The comment indicates that applicable comments noted above in the comments also apply to the Water Technical Report (Appendix N-1-1 to the Draft EIR). The applicable comments to the Water Technical Report have been incorporated into the Final EIR (see Correction and Addition Nos. Appendix N-1-1.A, Appendix N-1-1.B, Appendix N-1-1.C, and Appendix N-1-1.D, Section II, of the Final EIR).

**Comment No. 9-23**

22. Please replace all references to DS-4 in the document, as the Station No. that the Project should correctly refer to is DS-98.

**Response to Comment No. 9-23**

The comment requests that all references to DS-4 be replaced with DS-98, the correct reference to the Arch Distributing Station number. The comment has been incorporated into the Final EIR (see Correction and Addition Nos. IV.L.4.C, IV.L.4.L, and Appendix N-3.A, Section ii, of the Final EIR).

**Comment No. 9-24**

This letter is in response to the August 25, 20008 [sic] Notice of Completion and Availability of Draft Environmental Impact Report (DEIR) for the Metro Universal Project.

The Los Angeles Department of Water and Power (DWP) provided electric service information regarding this project to Thomas Properties Group, Inc on July 11, 2007. (See attached letter.) Several of DWP’s statements in that letter have not been correctly stated in the DEIR. To correct those erroneous statements, DWP requests several changes to the DEIR and DEIR Appendix regarding Electricity Supply.

Required Amendments:
1. Remove the following statement: found in DEIR, Section IV. Environmental Impact Analysis, J. Utilities, 4. Electricity Supply, Section 3. d.) (page IV.J-86) which incorrectly states:

DWP has indicated that the Project’s demand for electricity could be served via current supply capacities, and no improvements or additions to DWP’s off-site distribution system would be needed. Replace the above removed statement with LADWP’s previous and correct statement in the July 11, 2007 letter as follows:

The cumulative effects of this project will require the DWP to construct additional distribution facilities in the future. The project will require on-site transformation facilities.

2. Remove the following incorrect statement found in DEIR Appendix IV.J-4, Section 5.2 - Metro Universal Project Technical Report, Utilities, Electricity which incorrectly states:

LADWP can supply the Project with existing infrastructure; therefore, no improvements are required.

Replace the above removed statement with LADWP’s previous and correct statement in the July 11, 2007 letter as follows:

The cumulative effects of this project will require the Department to construct additional distribution facilities in the future. The project will require on-site transformation facilities.

3. Remove the following statement: also found in DEIR, Section IV. Environmental Impact Analysis, J. Utilities, 4. Electricity Supply, Section 3. d.) (page IV.J-86) which incorrectly states:

Also, each of the proposed buildings would have individual service from DWP and additional electrical conduits, wiring, and associated infrastructure would be installed. Individual customer pad-mount transformers and individual outdoor customer stations would be provided.

Replace the above removed statement with:

This development will be supplied by one or more on-site padmount, indoor or outdoor transformer stations. The developer will be charged for the additional cost of a requested installation(s) that exceeds the cost of DWP’s least-cost installation.

Additional Comments or Corrections:

1. DEIR Table IV.J-13, (Page IV J-86) Estimated Electrical Demand of the Proposed Project, has the third column titled “Existing Connected Load”. This load is not “Existing” so the title should be “Proposed Connected Load”.

City of Los Angeles
Final Environmental Impact Report

NBC Universal Evolution Plan
July 2012
2. On page IV.J-87, 4. Cumulative Impacts, the first sentence states “Development of the Project in combination with the some of the ... “ is unclear with the word “some” appearing to be intended as “sum.”

3. Also, further on in this same paragraph 4 is the following sentence that should be removed:

Thus, it is possible that with implementation of some of the related projects and other development, the resulting demand for electricity supply could be the same or less than the existing system.

This sentence is incorrect because while newer developments that replace older ones may be more efficient in their “per square foot” use of electricity, the higher density and additional floor space of new Los Angeles developments that replace old developments is almost always far greater than the efficiency savings and virtually always results in higher energy demands than existed with the older and smaller developments. Because of this almost certain increase in energy demand that results from redevelopment to higher overall density, the above noted sentence is misleading and should be removed.

Closing Comments and points of Emphasis

DWP would like to emphasize that this project will require significant additional distribution facilities to be installed including additional supply circuit capacity from the supplying receiving station to this area. The timing of the addition of capacity is dependent on the system loads at the time this project is implemented which is why the DWP uses the phrase “cumulative effect of this and other projects ... “ The added load of the Universal/MTA project will result in the need for additional distribution facilities. DWP would also like to make sure the project developers understand the Project Applicant may be financially responsible for some of these improvements (e.g., installation of electric power facilities or service connections) necessary to serve the proposed project.

As an additional clarification, DWP would supply the premises based on the least cost to LADWP (i.e., to minimize the number of padmount transformers and customer stations while supplying from a single secondary service voltage.) and as such would aim to supply most, if not all of the project from the 34.5kV system. This is not a determination, however, that this is in fact feasible and as the July 11, 2007 stated, “any additional facilities added to accommodate customer requirements would be charged to the customer.”

As the project proceeds further, please contact one of our Engineering Offices, as listed on page 1-4 of the Electric Service Requirements (available on-line at www.ladwp.com) for dealing with power services and infrastructure needs.
Please include LADWP in your mailing list and address it to the undersigned in Room 1044. We look forward to reviewing your environmental document for the proposed project. If there are any additional questions, please contact Ms. Nadia Dale of my staff at (213) 367-1745.

**Response to Comment No. 9-24**

As explained in Response No. 9-1, this comment relates to a September 29, 2008, letter from the Los Angeles Department of Water and Power to the Department of City Planning regarding the Metro Universal Project Draft EIR No. ENV-2007-933 EIR, which was published by the City in August 2008. The Metro Universal Project was a different project from the NBCUniversal Evolution Plan Project. Please see Topical Response No. 3: Defining the Proposed Project, which is presented in Section III.C, Topical Responses, of the Draft EIR, for further information regarding the Metro Universal Project. This comment does not address the environmental analysis in the Draft EIR for the Project.

With respect to the proposed Project, the Draft EIR for the Project explains that the Los Angeles Department of Water and Power has indicated that the existing electrical distribution system would need to be reinforced and a new distribution system installed for the City portion of the Project Site in connection with the Project (see page 1937 of Section IV.L.4, Public Services – Parks and Recreation, of the Draft EIR). Accordingly, pursuant to Project Design Feature L.4-3, the existing Los Angeles Department of Water and Power 34.5-kV system would be reinforced and a new Los Angeles Department of Water and Power distribution station would be constructed with local transformer stations on the Project Site (see pages 1933–34 and 1952–53 of the Draft EIR).
Comment Letter No. 10

Jin Hwang  
Civil Engineering Associate  
Los Angeles Department of Water and Power  
Water Resources Development Group  
jin.hwang@ladwp.com

Comment No. 10-1

Can you please let me know if the Planning Department sent a copy of the Draft EIR for the NBCU Evol. Plan to any Group or Division other than the Water Resources Division in LADWP for review?

Response to Comment No. 10-1

Copies of the Draft EIR were provided to the following divisions within the Los Angeles Department of Water and Power:

- Los Angeles Department of Water and Power  
  James B. McDaniel (Water Systems)  
  111 N. Hope St., Room 1455  
  Los Angeles, CA 90012

- Los Angeles Department of Water and Power  
  Jodean M. Giese (Power Systems)  
  111 N. Hope St., Room 1121  
  Los Angeles, CA 90012

- Los Angeles Department of Water and Power  
  Tom Erb  
  Water Systems, Water Supply Assessment  
  111 N. Hope St., Room 1460  
  Los Angeles, CA 90012

- Mr. Charles C. Holloway  
  Supervisor of Environmental Assessment  
  Department of Water and Power  
  111 North Hope Street, Room 1044  
  Los Angeles, CA 90012
• Department of Water and Power
  Water Systems, Master Planning Group
  Andy Niknafs
  111 N. Hope St., Room 1348
  Los Angeles, CA 90012
Comment Letter No. 11

Alan Kishbaugh, Chair
Mulholland Scenic Parkway Specific Plan Design Review Board
PO Box 1543
North Hollywood, CA 91614

Comment No. 11-1

The above referenced NBC Universal Evolution Plan (“the Plan”) contains within it a request/application to the City of Los Angeles to remove a portion of the property’s southeastern corner from the Mulholland Scenic Parkway Specific Plan (MSPSP).

Response to Comment No. 11-1

The comment correctly identifies that as one of the requested entitlement actions, the Project proposes an amendment to the Mulholland Scenic Parkway Specific Plan to remove a small portion of the southeast corner of the Project Site from the Outer Corridor of the Mulholland Scenic Parkway Specific Plan. The area that is the subject of this request is a portion of one parcel that totals less than 2 acres (or approximately 0.5 percent) of the 391-acre Project Site and is proposed to be included within the proposed Universal City Specific Plan area in order to create unified and consistent planning and zoning regulations for all portions of the Project Site to be located within the City.

Comment No. 11-2

The Mulholland Scenic Parkway Specific Plan is the result of decades of citizen effort to protect and preserve the character and uniqueness of Mulholland Drive, its Valley and City views, and its natural topography and native growth. In 1992, the Los Angeles City Council enacted the MSPSP with the applicable purposes to assure maximum preservation and enhancement of the parkway's outstanding and unique scenic features and resources; to preserve and enhance land having exceptional recreational and/or educational value; to assure that land uses are compatible with the parkway environment; to minimize grading and assure that graded slopes have a natural appearance compatible with the characteristics of the Santa Monica Mountains; to preserve the natural topographic variation within the Inner and Outer Corridors; to reduce the visual intrusion caused by excessive lighting; to preserve the existing ecological balance, and to protect environmentally sensitive areas; and topographic features therein.
Response to Comment No. 11-2

The comment summarizes the commenter’s perspective of the purpose of the Mulholland Scenic Parkway Specific Plan. For informational purposes, the Mulholland Scenic Parkway Specific Plan area is divided into two areas – the Inner and Outer Corridors. The boundaries of these corridors are determined via distance from the Mulholland Scenic Parkway right-of-way, with the outermost boundary of the Outer Corridor extending 0.5 mile outward from the Mulholland Drive right-of-way. Mulholland Drive reaches its eastern terminus in the Project area where it turns from a primarily east-west road to a north-south road as it connects with Cahuenga Boulevard. Based on these conditions, the strict application of the Outer Corridor boundary places the eight-lane Hollywood Freeway and areas on the north (far) side of the Freeway within the boundaries of the Mulholland Scenic Parkway Specific Plan (see Figure 28 on page 433 of the Draft EIR). The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 11-3

The analysis provided in the Draft Environmental Impact Report (DEIR) as it relates to the Mulholland Scenic Parkway Specific Plan states (pages 524-526) that the proposed Project would not be inconsistent with Mulholland Scenic Parkway Specific Plan goals to design projects that would be compatible and would preserve and enhance the range of visual experiences within the parkway environment; would not be inconsistent with objectives to ensure that landscape plantings are compatible with the existing native vegetation, would soften and shield structures from view, camouflage retaining and other walls, and complement views; would not be inconsistent with Mulholland Scenic Parkway Specific Plan design guidelines to emphasize a variety of native and nonnative plants in the landscape design, retaining those existing native plants whenever possible, recognizing that plant materials would be an important factor in hillside erosion control; would not be inconsistent with Mulholland Scenic Parkway Specific Plan objectives to ensure that all necessary utility-related structures, including above-ground facilities, would be designed to be as inconspicuous as possible; would incorporate design standards addressing height, lighting, landscape, setbacks, walkability, separation between structures, and exterior structural facades not inconsistent with the general objectives and purpose of the Mulholland Scenic Parkway Specific Plan design guidelines; would not be inconsistent with existing Mulholland Scenic Parkway Specific Plan policies to assure that land uses are compatible with the parkway environment, and therefore land use impacts with respect to the intention of the Mulholland Scenic Parkway Specific Plan to preserve the visual quality of natural open space would be less than significant.
Response to Comment No. 11-3

The comment summarizes the conclusions of the land use analysis contained in Section IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft EIR which concludes that with implementation of the proposed City Specific Plan, project design features, and proposed Project mitigation measures, the Project’s impacts related to the Mulholland Scenic Parkway Specific Plan policies would be less than significant. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 11-4

The current request by NBC Universal to have a small corner of their property, at the extreme limits of their southeastern boundary, removed from the MSPSP, though proposed to, be designated as open space (Open Space District No.2), may result in construction and/or uses inconsistent with the intent and purpose of the MSPSP. Specifically, the construction of Public Service Facilities and Substation/Utility infrastructure, Cellular Facilities and Signage could require grading or provide lighting which would adversely impact the intent and purpose of the MSPSP.

Therefore, we, the Mulholland Scenic Parkway Specific Plan Design Review Board oppose any modification of the Mulholland Scenic Parkway Specific Plan finding that modifying the MSPSP boundaries to exclude that portion of the NBC Universal Specific Plan, which falls within the existing MSPSP boundary, would result in a significant adverse impact to the Mulholland Scenic Parkway Specific Plan.

Response to Comment No. 11-4

For informational purposes, the Mulholland Scenic Parkway Specific Plan area is divided into two areas—the Inner and Outer Corridors. The boundaries of these corridors are determined via distance from the Mulholland Scenic Parkway right-of-way, with the outermost boundary of the Outer Corridor extending 0.5 mile outward from the Mulholland Drive right-of-way. Mulholland Drive reaches its eastern terminus in the Project area where it turns from a primarily east-west road to a north-south road as it connects with Cahuenga Boulevard. Based on these conditions, the strict application of the Outer Corridor boundary places the eight-lane Hollywood Freeway and areas on the north (far) side of the freeway within the boundaries of the Mulholland Scenic Parkway Specific Plan (see Figure 28 on page 433 of the Draft EIR). As concluded on page 525 of the Draft EIR in Section, IV.A.1, Land Use – Land Use Plans/Zoning, since the context of the Project Site is dominated by the Hollywood Freeway and is not contiguous with other areas within the Mulholland Scenic Parkway Specific Plan Outer Corridor, land use impacts with respect to the intention of the Mulholland Scenic Parkway Specific Plan to preserve the visual quality of natural open...
space would be less than significant. The analysis goes on to further conclude that the proposed Project would not be inconsistent with existing Mulholland Scenic Parkway Specific Plan policies to preserve the existing residential character of areas along and adjoining the Mulholland Drive right-of-way, to protect all identified archaeological and paleontological resources, and to assure that land uses are compatible with the parkway environment. Therefore, the impact of the Project with respect to the Mulholland Scenic Parkway Specific Plan policies and regulations for the Outer Corridor are concluded in the Draft EIR to be less than significant.

Additionally, the proposed Project development would not be located on or proximal to any designated Prominent Ridge as identified and defined in the adopted Mulholland Scenic Parkway Specific Plan on maps 1B through 6B. As discussed on page 1087 in Section IV.D, Visual Qualities, of the Draft EIR, the primary view resources available from the Mulholland Ridge geographic area are panoramic views of the San Fernando Valley and Verdugo Mountains in the background. Since the Project would not result in the substantial view coverage of a prominent resource, Project impacts from the Mulholland Ridge geographic area would be less than significant.

Based on the analysis and conclusions presented above, the Draft EIR concludes that the deletion of the small portion of the Project Site from the boundaries of the Mulholland Scenic Parkway Specific Plan would be less than significant.

**Comment No. 11-5**

We propose that if the Plan is implemented, adequate mitigation would include the establishment of a 4th Open Space District, which would conform to the standards set forth in Open Space District No.1, with the exception that no signage would be permitted in this 4th Open Space District. In the event that signage is permitted, such signage shall be limited to not more than one sign, measuring 20 feet wide by 10 feet tall, and no lighting shall be allowed.

**Response to Comment No. 11-5**

The area in the southeastern corner of the Project Site is proposed to be removed from the Mulholland Scenic Parkway Specific Plan area and included within the proposed Universal City Specific Plan area in order to create unified and coherent regulations for all portions of the Project Site to be located within the City. There is an existing sign in this southeastern tip of the Project Site that is approximately 1,000 square feet in size and illuminated. While the proposed City Specific Plan would permit the existing sign to be replaced with a new sign of 1,000 square feet in size, the Draft EIR (Section IV.D, Visual Qualities pages 1086–1087 and 1129–1131) analyzed the potential impacts of the Project including signage from the Mulholland Ridge and concluded that the overall character of
the area as seen from that height and distance would appear similar to current conditions. As there would not be any substantial changes in contrast, coverage or prominence, the impacts to visual character from the Mulholland Ridge area would be less than significant. The Draft EIR (Section IV.E.2, Light and Glare – Artificial Light, pages 1260–1277) also analyzed the potential impact of artificial light including from signage and concluded that impacts would be less than significant due to the regulations in the proposed City and County Specific Plans which include limitations on the placement, size and lighting of signs (i.e., light from Electronic Message signs would be limited to no more than 3 foot-candles from sunset to 10:00 P.M.; no more than 2 foot-candles from 10:00 P.M. to 2:00 A.M., as measured at the property line of the nearest residential zoned property outside of the Project Site; and be turned off from 2:00 A.M. to 7:00 A.M.).

Additionally, the commenter is referred to Response to Comment No. 11-4, above. The additional mitigation suggested by the commenter is not required because impacts related to the Mulholland Scenic Parkway Specific Plan are less than significant. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment Letter No. 12

John T. Walker, President
Studio City Neighborhood Council
president@scnc.info

Comment No. 12-1

The following comments relate specifically to the NBC Universal Evolution Plan (the “Project”) Draft Environmental Impact Report (the “DEIR”) dated November, 2010. The DEIR does not adequately address the impacts on the community from the proposed Project.

Response to Comment No. 12-1

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the environmental analysis in the Draft EIR are provided and responded to below.

Comment No. 12-2

Based on a review and analysis of each of the proposed alternatives (with the exception of the “no Project” alternative) the Board of the Studio City Neighborhood Council does not agree that: (i) any of the other alternatives as proposed would meet the Project goal which is to “recognize and protect the neighboring off-site residential and commercial developments through implementation of specific zoning regulations that would govern the development of the Project Site.” (ii) “These regulations, among other things, provide a level of certainty for the neighbors regarding the future use of the Project Site.” or (iii) “appropriate improvements on-site and to the local regional street systems would be implemented to accommodate future traffic growth.” [Volume I- Page 277].

Response to Comment No. 12-2

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. The comment quotes three objectives of the Project and states that the commenter does not agree with any determination that the analyzed Project alternatives meet the objectives. The commenter does not elaborate. The Draft EIR contains an analysis of each of the alternatives analyzed in Section V, Alternatives to the Proposed Project, of the Draft EIR and includes an analysis of the Project’s relationship with the Project objectives. This appears to be an introductory comment, and subsequent comments address many issues
Comment No. 12-3

In fact, the provisions of the proposed Universal City Specific Plan and the Universal Studios Specific Plan which are a fundamental part of the DEIR have been drafted in such a way as to effectively eliminate any requirement for the developer or its successors to comply with many of the provisions of: (i) the current zoning code, (ii) the 2002 City Sign Ordinance which was upheld by the courts in 2010, (iii) the provisions of the LA RIO Master Plan, (iv) the Ventura/Cahuenga Boulevard Corridor Specific Plan (the “VCBC Specific Plan”), and/or (v) the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan (the “Community Plan”). Each of these documents represents the long range planning vision for this part of the City of Los Angeles and includes important protections for its stakeholders. These governing documents should not be overridden or ignored.

Response to Comment No. 12-3

This comment refers to the provisions of the proposed Universal City Specific Plan and the proposed Universal Studios Specific Plan and not to the environmental analysis in the Draft EIR. The Draft EIR analyzed the Project relative to applicable land use plans, including, for example, the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, the City and County River Plans and zoning codes. As detailed in Section IV.A.1, Land Use – Land Use Plans/Zoning, the Project would not be inconsistent with applicable City and County land use plans.

Specific Plans are common land use approvals used to implement the General Plan in particular areas. In unique areas and developments, such as mixed use districts, a specific plan can provide zoning regulations where other conventional zoning districts may not achieve the desired planning results. Given the unique set of uses at the Project Site and the proposed development, including the mixed-use nature of the Project, a specific plan is an appropriate land use approval to consider for the Project Site.

Comment No. 12-4

The Community Plan at 1-1.2 has the stated policy objective: “Protect existing single family residential neighborhoods from new, out-of-scale development.” and at 1-1.3 “Protect existing stable single-family and low density residential neighborhoods from encroachment by higher density residential and other incompatible uses.” The Community Plan map identifies land where only single-family residential development is permitted: it protects these areas from encroachment by designating where appropriate, transitional residential densities which serve as buffers and reflects plan amendments and corresponding zone
changes which are directed at minimizing incompatible uses. This proposed Project site is at the east entry to the San Fernando Valley. The San Fernando Valley has long been recognized as the epitome of suburban life. [Appendix A]. This area is in no way an “urban core” as stated in the DEIR on page 278 and the goals and objectives of the Community Plan are not the creation of an “urban community” which would include a Mid-rise/High-rise Town Center and two Mid-rise/High rise Residential Areas. [Appendix B] Such development would not be compatible with either: (i) the existing scale and character of the community or (ii) the stakeholders’ vision for this neighborhood.

Response to Comment No. 12-4

Pursuant to the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan Generalized Land Use Map, a variety of land uses are designated within proximity of the Project Site, including open space, single-family residential, multiple-family residential, and commercial uses. Consistency with the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan’s Residential Goals and Objectives is discussed on pages 505-508 of Section IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft EIR. As discussed in the Draft EIR, with the requested approvals the proposed Project would not be inconsistent with this plan.

Regarding the use of the term “urban” in the Draft EIR, the U.S. Census Bureau defines an urban area as: “Core census block groups or blocks that have a population density of at least 1,000 people per square mile (386 per square kilometer) and surrounding census blocks that have an overall density of at least 500 people per square mile (193 per square kilometer).” The Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan area had a population density of approximately 5,372 persons per square mile during the 2000 census, with an estimated density of approximately 5,855 persons per square mile in 2009. The North Hollywood–Valley Village Community Plan area had a population density of approximately 12,783 persons per square mile during the 2000 census, with an estimated density of approximately 13,885 persons per square mile in 2009. The Van Nuys–North Sherman Oaks Community Plan area had a population density of approximately 12,307 persons per square mile during the


26 Los Angeles Department of City Planning, Demographic Research Unit, City of Los Angeles, Local Population and housing profile, Sherman Oaks–Studio Cy Community Plan Area, May 2011.

27 Los Angeles Department of City Planning, Demographic Research Unit, City of Los Angeles, Local Population and Housing Profile, N Hollywood–Valley Vlg Community Plan Area, May 2011.
2000 census, with an estimated density of approximately 12,891 persons per square mile in 2009. Further, the individual census tracts within the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan area that are closest to the Project Site have population density levels that range from 2,674 to 14,089 persons per square mile. The density in the project area well exceeds the population density used by the U.S. Census Bureau to define urban areas. For this reason, the term “urban” was used throughout the EIR as it refers to the project area.

The compatibility of the proposed land uses with the existing land uses is discussed in Section IV.A.2, Land Use - Physical Land Use, of the Draft EIR. The analysis as detailed therein concludes that the proposed Project would result in less than significant physical land use impact with regard to each of the areas included within the referenced Community Plan.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-5

VCBC Specific Plan designates much of the area surrounding the Project Site as “regionally impacted as to traffic” [Appendix C]. The DEIR identifies traffic as a significant and unavoidable impact and acknowledges that even after the mitigations proposed “significant and unavoidable” impacts would remain at” 9 intersections, 4 of which are in Studio City [Appendix D]. The analysis required by CalTrans [sic] of the impact of the Project to on-ramps and off-ramps and those freeway segments to which the Project would add the most traffic indicates that impacts would not be reduced to a less than significant level [Appendix E]. The Studio City Neighborhood Council requests that the Project be reduced in scale until it results in no significant adverse impacts and no unavoidable impacts after mitigations.

Response to Comment No. 12-5

As described in Section IV.B.1.6.a of the Draft EIR and Chapter V of the Transportation Study for the NBC Universal Evolution Plan Environmental Impact Report (Gibson Transportation Consulting, Inc. and Raju Associates, Inc., March 2010) (the

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28 Los Angeles Department of City Planning, Demographic Research Unit, City of Los Angeles, Local Population and Housing Profile, Van Nuys Community Plan Area, May 2011.

29 Los Angeles Department of City Planning, Demographic Research Unit, City of Los Angeles, Local Population and housing profile, Sherman Oaks–Studio Cy Community Plan Area, May 2012.
“Transportation Study”), the Project would mitigate its significant intersection impacts to less than significant at all but nine of the analyzed intersections, four of which are projected to operate at an acceptable Level of Service (Level of Service D or better). These nine intersections are located adjacent to the Project Site and, as noted in Chapter V of the Transportation Study, most have existing constraints that render mitigation infeasible to achieve a less than significant impact at these locations.

Regarding the remaining significant and unavoidable intersection and freeway segment impacts, as described in Sections 15121(a) and 15362 of the CEQA Guidelines, an EIR is an informational document which will inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize any significant effects, and describe reasonable project alternatives. “The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.” (Public Resources Code Section 21002.1(a).) “Each public agency shall mitigate or avoid the significant effects on the environment of projects that it carries out or approves whenever it is feasible to do so.” (Public Resources Code Section 21002.1(b) (emphasis added).) If economic, social, or other conditions make it infeasible to mitigate one or more significant effects on the environment, the project may still be approved at the discretion of the public agency. (Public Resources Code Section 21002.1(c).)

In approving a project which will result in the occurrence of significant effects which are identified in the final EIR but not avoided or substantially lessened, the lead agency must state the specific reasons to support its action in a statement of overriding considerations. The decision whether to approve the Project and adopt a statement of overriding considerations will be made by the decision-makers consistent with CEQA.

Alternatives analyzed in Section V, Alternatives to the Proposed Project, of the Draft EIR, included substantial reductions in development compared to the proposed Project. The commenter is referred to Section V of the Draft EIR for additional information.

Contrary to the suggestion in the comment, CEQA does not require that a Project have no significant impacts in order to be approved. As explained above, the decision-maker may approve a project with unavoidable adverse environmental effects if the benefits of the project outweigh such effects. The commenter is also referred to Topical Response No. 1: EIR Process (see Section III.C, Topical Responses, of this Final EIR). The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment No. 12-6

The DEIR improperly defines the Studio City Community as a hillside community buffered from the Project by the 101 Freeway and the existing commercial buildings. It further improperly defines its borders [Appendix F]. As a result, the DEIR concludes that there are no significant impacts to Studio City [Appendix G]. Studio City actually includes the Metro Redline Station, Campo de Cahuenga, South Weddington Park, the Island Neighborhood, Rio Vista Elementary School, the Ventura Boulevard area of the ACBC Specific Plan and the entire flatland area from the Hollywood Freeway to the east, the 101 Ventura Freeway to the north and Fulton to the West. Therefore, the Project would actually result in many significant and unavoidable impacts to Studio City including impacts on traffic, noise and air quality. One major traffic impact on Studio City is at the Project access point of Lankershim Boulevard and Campo de Cahuenga Way/Universal Hollywood Drive. Despite this, the DEIR falsely states “the proposed Project would not substantially and adversely change the existing land use relationships between the Project site and the Studio City Area [Appendix H].

Response to Comment No. 12-6

The Draft EIR discusses the potential impacts of the Project on various surrounding communities. The communities closest to the Project Site are, in some cases, discussed by reference to smaller geographies because of their proximity to the Project Site. For example, for physical land use, noise, and aesthetic impacts, the Draft EIR discusses potential impacts to the Island/City View Lofts, Campo de Cahuenga and Weddington Park (South) specifically, rather than include them in a broad Studio City discussion. As explained on page 549 in Section IV.A.2, Land Use – Physical Land Use, of the Draft EIR, the more distant areas of Studio City are discussed together as the Studio City area. Appendices F and H of the commenter’s letter referenced in the comment are excerpts of the Physical Land Use discussion in the Introduction/Summary of the Draft EIR which shows this organization of the information.

As stated in the Draft EIR, the Project would result in significant and unavoidable environmental impacts with regard to the following five issues:

- Traffic (during Project operations and cumulative conditions);
- Noise (during Project construction and cumulative conditions);
- Air Quality (during Project construction and operations and cumulative conditions);
- Solid Waste (during Project operations and cumulative conditions); and
• Off-Site Mitigation Measures (during construction and operations).

The traffic impact referenced in the comment is discussed at page 691 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, which states that a significant and unavoidable impact would remain at the intersection (along with eight other intersections). The impact is discussed by reference to the intersection, not the community in which the intersection is located. The comment incorrectly equates a traffic impact with a physical land use impact. As explained in Section IV.A.2, Land Use – Physical Land Use, of the Draft EIR, the proposed Project would have a significant physical land use impact if the proposed Project would substantially and adversely change the existing land use relationship between the Project Site and existing off-site uses or would disrupt, divide, or isolate existing neighborhoods or communities. The Draft EIR concludes that physical land use impacts would be less than significant.

The potential impacts of the Project attributable to increasing the density and height of development are addressed comprehensively in other sections of the Draft EIR. The traffic impacts, for example are addressed in Section IV.B.1, Traffic/Circulation.

Comment No. 12-7

The DEIR acknowledges that significant impacts on the environment from the Project cannot [sic] be reduced to a level of insignificance even after mitigation and they are therefore unavoidable. An “Unavoidable” impact is simply not acceptable in an area where there are already significant cumulative unmitigated impacts from developments that have been built over the past three years. The following comments are identified by the DEIR page number to which they relate. Each of these comments should be considered as a question of who, what, where, when or why as such would apply and we request a response to each of them.

Response to Comment No. 12-7

This comment appears to be an introductory comment for which specific comments follow. Responses to specific comments are provided below.

As described in Sections 15121(a) and 15362 of the CEQA Guidelines, an EIR is an informational document which informs public agency decision-makers and the public of the significant environmental effects of a project, identifies possible ways to minimize any significant effects, and describes reasonable project alternatives.

As to the issue of unmitigated significant impacts pursuant to CEQA Guidelines Section 15093(a), “CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable
environmental risks when determining whether to approve the project” (emphasis in original). If the benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered “acceptable.” In approving a project which will result in the occurrence of significant effects which are identified in the final EIR but not avoided or substantially lessened, the lead agency must state the specific reasons to support its action in a statement of overriding considerations. The decision whether to approve the Project and adopt a statement of overriding considerations will be made by the decision-making agency consistent with CEQA. While the balancing of the potential Project benefits and impacts shall be done by the decision-makers, it is noted that the Draft EIR includes discussion of various Project benefits including, for example, economic (see Section IV.N.1, Employment), housing (see Section IV.N.2, Housing), and promotion of City and County policies (see Section IV.A.1, Land Use – Land Use Plans/Zoning).

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the environmental analysis in the Draft EIR are responded to below.

Comment No. 12-8

This DEIR does not include the Metro Universal Project although it is mentioned on page 269 of Volume I. [Appendix I]. The DEIR for that proposed project should be cumulatively reviewed with the NBC Universal Evolution Project as the communities requested before this DEIR was prepared. The Studio City Neighborhood Council has previously submitted extensive comments, with respect to the Metro Universal Project ENV-2007-933-EIR expressing our objection to the numerous **significant unavoidable** impacts that would result from that project. Without reviewing the DEIRS for both projects simultaneously, the cumulative impact of these projects cannot be properly evaluated [Appendix J].

Response to Comment No. 12-8

As noted in the Project Description of the Draft EIR, the proposed Metro Universal project at the Universal City Metro Red Line Station site was an independent development project and is not part of the proposed Project. As such, pursuant to Section 15130 of the CEQA Guidelines, in this EIR the proposed Metro Universal project was classified as a related project and, per the CEQA Guidelines, was addressed in the analysis of cumulative impacts within each environmental issue included in Section IV, Environmental Impact Analysis, of the Draft EIR. (See pages 269 and 383 of the Draft EIR.) With regard to the Metro Universal project, the commenter is referred to Topical Response No. 3: Defining the Proposed Project (see Section III.C, Topical Response, of this Final EIR).
The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-9

The remainder of this document is organized into three sections: (i) General Comments on the DEIR, (ii) Comments on the Universal City Specific Plan and (iii) Traffic Comments. The appendices, attachments and exhibits attached to this letter of comment contain documentation in support of the comments to which they relate.

Response to Comment No. 12-9

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the environmental analysis in the Draft EIR are provided and responded to below.

Comment No. 12-10

The Studio City Neighborhood Council has also received questions and comments related to the Project from its stakeholders. The comments received are included as Appendix JJ to this letter.

Response to Comment No. 12-10

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-11

The City of Los Angeles has concluded that of the 17 categories of environmental factors listed in the Initial Study Checklist 15 of them were determined to have potentially significant impacts. They further concluded that of the 87 specific items in the checklist, 67 of them were determined to have potentially significant impacts. Clearly this demonstrates that the project, as proposed would have a permanent significant adverse impact on our community.

Response to Comment No. 12-11

The Initial Study referenced in the comment was a preliminary evaluation which determined that because of the potential for impacts to be created by the proposed Project, an EIR should be prepared. The determination in an Initial Study that a Project may have a “potentially significant impact” does not equate to a finding of a significant impact in an EIR analysis. The commenter is referred to Response to Comment Nos. 12-6 and 12-7, above,
as well as Topical Response No. 1: EIR Process (see Section III.C, Topical Responses, of this Final EIR).

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-12**

Despite the volume of information in the DEIR, it does not adequately address many of the impacts of the proposed Project. We do not agree with the conclusion set forth that certain impacts cannot be mitigated and are unavoidable or that the significant effects on the environment have been analyzed adequately in the DEIR. CEQA guidelines require the selection of the environmentally superior alternative. We agree that the proposed Project should comply with CEQA guidelines. The Project should be reduced in scale and character until it results in no significant adverse impacts after mitigation.

**Response to Comment No. 12-12**

The Draft EIR, in accordance with the CEQA Guidelines, identifies alternatives which are classified as feasible or infeasible. As discussed in Section V, Alternatives to the Proposed Project, of the Draft EIR, numerous alternatives that might avoid or substantially lessen Project impacts were considered. As discussed in more detail on pages 2153–2160 of the Draft EIR, alternatives were identified but subsequently rejected from further analysis because they failed to meet most of the Project objectives, would not reduce or eliminate the Project’s impacts, or would create a new significant impact. In addition, an alternative site was considered, but rejected from further analysis because the proposed development within the Studio, Business, and Entertainment Areas would not be viable at any location other than the Project Site, and no feasible alternative location was identified for the Mixed-Use Residential Area. Of the feasible alternatives that are analyzed in detail, none of these alternatives are rejected. Alternatives analyzed in Section V, Alternatives to the Proposed Project, of the Draft EIR, included substantial reductions in development compared to the proposed Project. The commenter is referred to Section V of the Draft EIR for additional information.

As required by the CEQA Guidelines, the Draft EIR identifies the Environmentally Superior Alternative. Many comment letters submitted during the public comment period for the Draft EIR raised concerns about the proposed Project’s plan to construct 2,937 residential dwelling units in the existing Back Lot Area and suggested augmenting the existing land uses. In response to these public comments, a new alternative has been included in the Final EIR which deletes the residential portion of the proposed Project. This alternative is referred to as the No Residential Alternative (or “Alternative 10”). As a result, the analysis and selection of the Environmentally Superior Alternative was revised to
include Alternative 10 (see Correction and Addition V.L, Section II, of this Final EIR). Based on this analysis, Alternative 10, rather than Alternative 4, is selected as the Environmentally Superior Alternative as the overall impacts of Alternative 10 are less than those of Alternative 4.

Regarding the significant and unavoidable impacts and a reduced size alternative, the commenter is referred to Response to Comment No. 12-5 and 12-7, above.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-13**

Studio City has changed considerably since 2007. Yet most of the supporting tables and maps were prepared as of 2007. We request that these documents be updated. We request that the Final EIR address each concern listed herein and that the proposed Project not be allowed to proceed in its current form. We request that no changes to the current zone code designations or other regulations and ordinances that are protective of our community be permitted. The motion passed by the SCNC in support of the conclusions set forth in this document is included at Exhibit 21.

**Response to Comment No. 12-13**

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. CEQA requires that the EIR analyze a baseline beginning with the issuance of the Notice of Preparation. The Notice of Preparation was circulated starting July 19, 2007. The commenter is referred to Topical Response No. 1: EIR Process (see Section III.C, Topical Responses, of this Final EIR). As such, the use of 2007 as the baseline year for the Draft EIR is consistent with CEQA.

**Comment No. 12-14**

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<th>DEIR Page No.</th>
<th>General Comment</th>
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<td>Volume IV B 1</td>
<td>The Project is expected to generate a net total of 36,451 daily trips on a typical weekday. The DEIR states that many of the traffic improvements are addressed and accommodated by the proposed Metro Universal Project which is estimated to produce an additional 15,000 car trips, resulting in a combined total of almost 50,000 additional trips. Sharing of mitigation measures is not feasible as the DEIR for the Metro Universal Project by itself acknowledges that project will result in <strong>significant and unavoidable</strong> impacts that cannot</td>
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be mitigated. Therefore, credit for mitigation measures of one project cannot be deemed to benefit the other.

Response to Comment No. 12-14

As explained in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR and Appendix A of the Transportation Study (see Appendix E-1 of the Draft EIR), pursuant to standard City of Los Angeles Department of Transportation policies and procedures, the traffic analysis included traffic generated by the proposed Metro Universal project, which is no longer proposed. The traffic analysis did not, however, include the proposed Metro Universal project traffic mitigations as future base roadway improvements, since the proposed Metro Universal project was not an entitled, approved development. As noted in Section IV.B.1.5.c of the Draft EIR, the Project’s mitigation program includes certain improvement measures that could be shared with another project, such as the Metro Universal project. At such locations, the Project’s traffic impact analysis accounts for only the excess mitigation credit available at those locations. With regard to the Metro Universal project, the commenter is referred to Topical Response No. 3: Defining the Proposed Project (see Section III.C, Topical Responses of this Final EIR).

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-15

| Volume IV B 1 page 689-690 | It is not acceptable to simply acknowledge that “if any of the traffic mitigation measures ... are determined to be infeasible or necessary permits/approvals to implement mitigation measures cannot be obtained, then a significant impact (or impacts) may remain.” Neither is it acceptable to determine that a mitigation measure is not feasible. Significant and unavoidable impacts are not acceptable. |

Response to Comment No. 12-15

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. The Applicant has worked with the City of Los Angeles Department of Transportation, County of Los Angeles, the City of Burbank, and the California Department of Transportation (Caltrans) to develop
mitigation measures that meet the standard policies and guidelines of these jurisdictions. The Draft EIR acknowledges that at the time of the implementation of the proposed improvements, the governing jurisdictions may determine that certain components of the mitigation measures are infeasible based on conditions at that time. Therefore, the Draft EIR has provided the decision-makers with the necessary information required to be considered for the entitlement of the Project. See also Response to Comment Nos. 12-5 and 12-7 regarding significant and unavoidable impacts.

**Comment No. 12-16**

| While the cumulative effect of all car trips must be considered, all traffic mitigations must be developed separately and be fully implemented before either project is allowed to begin construction. |

**Response to Comment No. 12-16**

The Project’s traffic analysis included the cumulative impacts of traffic from the 256 related projects (including the proposed Metro Universal project), which is no longer proposed, and other developed proposals and growth included in the Southern California Association of Government’s regional transportation model. Therefore, the traffic analysis adequately analyzes the Project’s traffic impacts.

Regarding the sharing of mitigation measures, the commenter is referred to Response to Comment No. 12-14, above. Regarding the Metro Universal project, the commenter is referred to Topical Response No. 3: Defining the Proposed Project (see Section III.C, Topical Responses, of this Final EIR).

The comment also states that the Project’s mitigations should be implemented before the Project is allowed to begin construction. As noted in Section IV.B.1.5.n, Traffic/Access – Traffic/Circulation, of the Draft EIR, similar to other developments in the City of Los Angeles, a detailed transportation mitigation phasing plan has been developed for the Project using trips as thresholds that were estimated based on the proposed development in each phase. The Project’s transportation mitigation phasing program has been designed such that the Project is required to implement all mitigation measures tied to each phase of development prior to moving onto the next development phase. As noted in the City of Los Angeles Department of Transportation’s Assessment Letter dated April 2, 2010 (see Appendix E-2 of the Draft EIR):

“Prior to the issuance of any building permit for each sub-phase, all on- and off-site mitigation measures for the sub-phase shall be complete or suitably guaranteed to the satisfaction of LADOT.”
and

"Prior to the issuance of any temporary or permanent Certificate of Occupancy in the final sub-phase, all required improvements in the entire mitigation phasing plan shall be funded, completed, or resolved to the satisfaction of LADOT. “

Consistent with the Los Angeles Department of Transportation Assessment Letter, the proposed City and County Specific Plans provide that prior to issuance of the approval for a Project under the Specific Plan, the Department of Transportation assign traffic improvements, if any, to the Project from the approved Traffic Mitigation Phasing Plan. Further, the proposed City Specific Plan requires that prior to the issuance of a building permit for a Project under the City Specific Plan, the Applicant shall guarantee, to the satisfaction of the Department of Transportation, the construction of any required traffic improvements for the Project (See Section 7.2 of the proposed Universal City Specific Plan included as Appendix A-1 of the Draft EIR). Similarly, the proposed County Specific Plan requires that prior to the issuance of a building permit for a Project, the Applicant provide documentation satisfactory to the County Regional Planning Director that the Applicant has guaranteed the construction of the required traffic improvements to the satisfaction of the City of Los Angeles Department of Transportation. (See Section 14 of the proposed Universal Studios Specific Plan included as Appendix A-2 of the Draft EIR).

**Comment No. 12-17**

| Universal City Specific Plan Design Guidelines Page 4 | These design guidelines address transitional heights only with respect to flatlands. They do not address the impact of transitional heights on the existing hillside communities. [Appendix K-1]. Objective 1-3.3 of the Community Plan to “preserve existing views in the hillside areas” has not been considered as required [Appendix K-2]. Construction of buildings 850 feet high or between 70 to 80 stories tall will obliterate the views from the hillside communities. The project must be reduced in mass until there is no obstruction of these protected views. |

**Response to Comment No. 12-17**

The comment addresses the heights proposed in the Universal City Specific Plan with references to the draft Universal City Design Guidelines (Comment letter Exhibit K-1) and policies in the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan (Comment letter Exhibit K-2). The comment appears to mistakenly interpret the proposed Universal City Specific Plan as allowing buildings up to 850 feet in height. However, as Figure 16 in the Draft EIR and Exhibit No. 5 of the proposed Universal City
Specific Plan illustrate, the height zones proposed would limit building heights to between 625 feet above mean sea level to 900 feet above mean sea level within the proposed Universal City Specific Plan area. Building heights are defined at fixed elevations expressed in terms of feet above mean sea level (msl). This reference system, as opposed to expressing building height in terms of feet above grade, is used to provide certainty as to actual building heights, as well as a uniform way of measuring building height across the site, given the varying topography. The mean sea level height limit would allow buildings of up to 200 feet in height, which would be up to 19 stories, in the proposed Mixed-Use Residential Area, depending upon the applicable height zone and future grade elevation. The corresponding approximate building heights are summarized in Table 4 on page 298 of Section II, Project Description, of the Draft EIR.

Pages 1066–1107 of Section IV.D, Visual Qualities, of the Draft EIR provide the analysis of the potential impacts of the proposed maximum building heights relative to the visual character and views of valued visual resources and concluded that impacts would be less than significant as the Project would not result in substantial adverse changes with regard to contrast, prominence, and coverage from the vantage points analyzed.

**Comment No. 12-18**

| Table 2 Total Wastewater Flows | The table in the DEIR indicates that all pipes would be less than 50% full at the point of connection to the City sewer system. The Conclusion in the DEIR with respect to all existing and proposed private sanitary sewer pipes and areas evaluated in this study is that the pipes “do not need to be upsized as a result of the proposed project.” It also states the “City’s 72-inch diameter Valley Relief Sewer and Parallel 42-inch diameter sewers have the capacity to accommodate the additional wastewater flows from the County portion of the project site. We do not agree with this conclusion. The infrastructure in our City is not sufficient to handle existing volumes. |

**Response to Comment No. 12-18**

As referenced by the comment and discussed in Section IV.L.1, Utilities – Sewer, of the Draft EIR, the Project would be adequately served by both sewer treatment capacity and conveyance infrastructure.

The comment references Table 2 from the Sewer Area Study that was conducted to determine the amount of sewer flows generated from the County portion of the proposed Project based on County methodology and is included as Appendix N-2-3 to the Draft EIR.
As explained on page 5 of the Sewer Area Study, the referenced table presents the flow rates and the pipe status of on-site sewers on the County portion of the Project Site in percent full at the point of connection of the on-site sewers to the City sewer system. As shown in Table 2 on page 5 of the Sewer Area Study, all on-site pipes would be less than 50 percent full at the point of connection to the City sewer system within the County portions of the Project Site.

Updated information from the Bureau of Sanitation regarding the current gauging information for the 18-inch and 42-inch sanitary sewers and the Bureau of Sanitation’s terminology regarding current approximate flow levels has been incorporated into the Final EIR (see Correction and Addition Nos. IV.L.1.A, IV.L.1.B, and IV.L.1.C, Section II, of this Final EIR).

In addition, the Project would include the installation of new sewer infrastructure. As explained on page 1842 in Section IV.L.1, Utilities – Sewer, of the Draft EIR, to accommodate the increase in wastewater flows resulting from Project implementation, the Project includes an additional 16-inch off-site sewer line that would run parallel to the Los Angeles River Flood Control Channel along River Road and connect to an existing stub of the Valley Relief Sewer. The Project also includes as project design features the construction of additional 8-, 10-, and 12-inch sewer lines in the Mixed-Use Residential Area and removal and reconstruction of some of the existing 12-inch sewer lines along Universal Hollywood Drive. Further, some existing on-site sewer lines in the Business, Studio, and Entertainment Areas would be replaced with larger lines to accommodate the increased wastewater flow as areas of the Project Site are further developed.

As discussed in detail on page 1846 in Section IV.L.1, Utilities – Sewer, of the Draft EIR, the Project would implement a comprehensive program of water conservation measures that would also serve to reduce the Project’s demand on the wastewater system. As explained in the Draft EIR, the Project would have a less than significant impact to the City’s main off-site sewer lines serving the Project Site. In addition, all new on-site sewer lines would be sized to adequately accommodate increased flows from the Project so that no on-site existing sewer lines would be operating at capacity.

Pursuant to Project Design Feature L.1-1 set forth on page 1852 of the Draft EIR, prior to the development of a new building, the capacity of the on-site sewer lines serving the building must be examined and replacement or new sewer lines must be installed as necessary. Further, pursuant to Project Design Feature L.1-3, new sanitary sewers in the City areas of the Project Site must be designed to conform to the standards of the City’s Bureau of Sanitation, and additional on-site sanitary sewer system improvements must be constructed as required to support the additional development per these standards. (See pages 1842 and 1852 of the Draft EIR.) The Project’s wastewater flows would be conveyed to the Hyperion Treatment Plant, which has sufficient capacity for the Project.
(See pages 1846–1847 of the Draft EIR.) As concluded in the Draft EIR, Project impacts with regard to conveyance infrastructure and Hyperion Service Area capacity are less than significant. (See page 1852 of the Draft EIR.)

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-19**

| Odors emanating from the sewer into local residences and businesses are prevalent. As a result, Studio City and North Hollywood are listed as “hot spots” in the City’s Sewer Odor Control Master Plan dated October 2006. Physical characteristics in the area that contribute to this include insufficient slope, severe slope reductions, downstream diameter reductions, major junction structures and proximity to an inverted siphon [Appendix L]. One action taken to reduce odors was the construction of a scrubber at Radford/Woodbridge and construction of an additional scrubber is being considered. The long term approach for odor control by reducing the pressure in the area is the construction of the Glendale Burbank Interceptor Sewer (the “GBIS”) [Appendix L]. Until construction of that interceptor sewer is completed and an analysis done to determine that it is effectively addressing the problem, no additional project construction should be permitted. |

**Response to Comment No. 12-19**

The Project’s wastewater flows are not anticipated to cause odors in neighborhoods around the wastewater collection system. As explained in the City’s 2011 Sewer Odor Control Master Plan, a natural phenomenon within any wastewater collection system is the production of odorous gases especially hydrogen sulfide. The City has been working to address sewer odor issues and has made substantial progress in controlling odors within its sewer system. Many odor control measures are currently being implemented, including the use of air scrubbers at various problem locations in the collection system. As noted in

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the 2011 Sewer Odor Control Master Plan, sewer-related odor complaints to the City odor complaint hotline continue to decline steadily.

The comment includes a reference to Appendix L to the comment, which contains a couple of pages from the Executive Summary of the 2006 Sewer Odor Control Master Plan, with highlighted references to the Studio City/North Hollywood “hot spot” area and associated recommendations (discussed below). The 2011 Sewer Odor Control Master Plan, which is the most current version of the Sewer Odor Control Master Plan, evaluates the City’s current odor control program, conducts studies in strategic areas throughout the City, identifies causes of odors, and provides recommendations for improvements. The City has developed and implemented an extensive system of capital improvement projects to reduce odors and improve the overall operation of the collection system. Carbon scrubbers are one type of air treatment facilities used to remove odors from sewer gases. There are currently 13 carbon scrubbers operating in the wastewater collection system.

As explained in the 2011 Sewer Odor Control Master Plan, the significant sewers in the East Valley Area are the Additional Valley Outfall Relief Sewer, the East Valley Relief Sewer and portions of the North Outfall Sewer and the Valley Outfall Relief Sewer. The North Hollywood Interceptor Sewer, and the Forman Avenue sewer from Camarillo Street to Valley Spring Lane are also included in this study area. Wastewater flows from the Project Site do not flow into these sewers. Effluent from the Tillman Water Reclamation Plant (TWRP) flows through this area. The TWRP does not treat biosolids and, therefore, returns them to the sewer system to be conveyed to Hyperion for treatment. These concentrated biosolids travel through the Additional Valley Outfall Relief Sewer, then via the East Valley Relief Sewer and the North Outfall Sewer to the Toluca Lake area. At the intersection of Valley Spring Lane and Forman Avenue, this flow is split between the Valley Relief Sewer and the North Outfall Sewer on its way to Hyperion. The high concentration of biosolids causes the sewage to produce excessive hydrogen sulfide, leading to odor problems.

With respect to the East Valley area, as noted above, several previous recommendations have been implemented that have reduced gas pressure and hydrogen sulfide concentrations in the area’s sewers. According to the 2011 Sewer Odor Control Master Plan, the construction of a carbon scrubber at the Radford Siphon in Studio City and the addition of magnesium hydroxide to the sewer system at the TWRP are two measures that have had significant benefit. The diversion of flow from the Forman Avenue Sewer to the North Outfall Sewer has lowered gas pressure in the Forman Avenue Sewer and reduced odor complaints in this area. Furthermore, a trap maintenance hole on the Forman Ave Sewer was removed, allowing backed-up gas pressure to flow downstream, greatly reducing gas pressure. (See page 113 of the 2011 Sewer Odor Control Master Plan.)
The City’s 2011 Sewer Odor Control Master Plan recommendations for the East Valley area are to: (i) continue to monitor the area for pressure and hydrogen sulfide; (ii) control air flow dynamics through sewer flow management by manipulating sewage flow within the sewer system; and (iii) continue monitoring pressures on the East Valley Relief Sewer, North Hollywood Interceptor Sewer, and Valley Outfall Relief Sewer and seal maintenance hole lids where necessary. (See page 119 of the 2011 Sewer Odor Control Master Plan.)

The commenter suggests that no additional project construction should be permitted until construction of the Glendale–Burbank Interceptor Sewer is completed and an analysis is done to determine that it is effectively addressing sewer odor. As noted above, the Project’s wastewater flows are not anticipated to cause odors in neighborhoods around the wastewater collection system, and the Project’s wastewater flows do not flow into the odor control area at issue.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-20

| We question the validity the study cited as the Count [sic] of Los Angeles Superior Court has decided that the City of Los Angeles did not properly identify and analyze all of the environmental impacts of the GBIS. The Court determined there was a lack of analysis in regards to settlement impacts, traffic impacts, traffic mitigation, construction noise and cumulative impacts. The first step of decertification of that EIR was taken by Los Angeles Public Works Board on December 12, 2007 [Appendix M]. |

Response to Comment No. 12-20

The comment references the litigation regarding the City’s Glendale–Burbank Interceptor Sewer (GBIS). The comment also references Appendix M to the comment, which includes information from the City of Burbank’s website about the Glendale–Burbank Interceptor Sewer. The comment appears to have circled the statements regarding the County of Los Angeles Superior Court’s decision that the City of Los Angeles did not properly identify and analyze all of the environmental impacts of the GBIS, and that the first step of decertification was taken by the Los Angeles Public Works Board on December 12, 2007.
For more information regarding the City’s Glendale-Burbank Interceptor Sewer project, please see pages 1834–1835 in Section IV.L.1, Utilities – Sewer of the Draft EIR, which explains the status of the City’s Glendale Interceptor Sewer project and that the Draft EIR does not assume completion of that project in analyzing the proposed Project’s wastewater impacts.

**Comment No. 12-21**

| Appendix I-1-1 Page 4 | The description of the environmental setting is in error as it indicated that “The upper portion of the watershed is forest and open space.” [Appendix N]. This statement does not take into account the devastation to the forest area caused by the Station Fire in 2009 [Appendix O]. FEMA officials have concluded that the Los Angeles region faces major flood risk. The Los Angeles river adjacent to the project site is part of the region’s flood control system. Much of the system was designed more than 40 years ago. Since then, massive urban sprawl has sharply reduced the amount of unpaved ground available to absorb water, and runoff has increased about 25% [Appendix P]. |

**Response to Comment No. 12-21**

The comment questions a statement regarding the environmental setting contained in the Drainage Technical Report for the Project in light of the 2009 Station Fire. The comment references Appendix N to the comment, which is an excerpt from the Drainage Technical Report attached as Appendix I-1-1 to the Draft EIR, with the following sentence on page 4 of the technical report regarding the Los Angeles River watershed highlighted: At the time of publication of the Notice of Preparation in 2007, the fire referenced in the comment had not occurred; however, regardless of the fire, the area continues to be a forest. “The upper portion of the watershed is forest and open space, however the remaining watershed and area in which the Project Site is located is highly developed.” According to the comment, this statement does not take into account the Station Fire in 2009, and the comment also references Appendix O to the comment, which is a Los Angeles Times fire map from July 12, 2010, and a list of various fire incidents and associated information. While the comment is correct that fire has occurred within the watershed, as the Draft EIR notes, the Los Angeles River watershed covers a land area of over 834 square miles from the eastern Santa Monica Mountains to the San Gabriel Mountains in the west. The 2009 Station Fire does not change the on-site hydrology or drainage analysis regarding the proposed Project.
In addition, the comment asserts that the Los Angeles region faces major flood risk as determined by the Federal Emergency Management Agency and notes that the Los Angeles River Flood Control Channel adjacent to the Project Site is part of the region’s flood control system, much of which the comment states was designed more than 40 years ago. The comment references Appendix P to the comment, which is a *Los Angeles Times* article dated October 25, 1997, regarding major flood risk in the Los Angeles Basin in the event of a 100-year flood. The comment also suggests that urban sprawl has reduced the amount of unpaved ground available to absorb water and runoff has increased about 25 percent, according to Appendix P to the comment. As explained in the Draft EIR (see page 1337 of Section IV.G.1.a, Water Resources – Surface Water - Drainage), the Project Site primarily drains directly to the Los Angeles River Flood Control Channel through an on-site storm drain system. The Los Angeles River Flood Control Channel is under the jurisdiction of the County of Los Angeles and the U.S. Army Corps of Engineers. According to the Federal Emergency Management Agency Flood Insurance Rate Maps, the Los Angeles River Flood Control Channel would accommodate and contain stormwater associated with a 100-year frequency storm event in the vicinity of the Project Site. The Project Site is within Federal Emergency Management Agency Flood Zone C, which is defined as an area of minimal flooding. (See page 1337 of the Draft EIR.) As the Draft EIR further explains, the Project Site is not within a flood protection district as designated by Los Angeles County, or an area of special flood hazard as designated in the City of Los Angeles Flood Hazard Map. The Project Site is outside the existing floodplain of the Los Angeles River. Hence, the Project Site is not subject to inundation from 100-year floodwaters. (See pages 1337–1338 of the Draft EIR.)

Further, as described in the Draft EIR, with incorporation of the detention feature located in the Mixed-Use Residential Area (Project Design Feature G.1.a-2), the proposed Project would not create an increase in the peak flow rate, which measures the highest rate at which storm water is leaving the Project Site and entering the Los Angeles River Flood Control Channel during a storm event. In addition, development in the Business, Entertainment, and Studio Areas of the Project Site, with certain exceptions as specified in the proposed County Specific Plan, would incorporate applicable County Low Impact Development Standards Best Management Practices that would reduce the change in flow rates. As there would be no increase in peak flow rate with the proposed Project, the Project would not result in a substantial increase in the amount of surface water and would not result in a permanent adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow. (See page 1355 of the Draft EIR.) With implementation of the proposed storm drain system improvements, and the recommended mitigation measures, the Project would have a less than significant impact with respect to surface water drainage.
Comment No. 12-22

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“Development of the Project would include some net conversion of existing pervious surfaces to impervious surfaces, which would have the potential to reduce ground water recharge. Additionally, “Development associated with the proposed Project would result in a net increase in impervious surface to approximately 70 percent of the Project Site.” We do not agree that the “operation of the Project would not result in demonstrable and sustained reductions of groundwater recharge and capacity.”

Response to Comment No. 12-22

The Draft EIR analyzes the change in impervious surface associated with the proposed Project. As the Draft EIR explains, the Project Site was divided into site-specific land use categories and percent impervious percentage factors assigned, based on the land use, to determine the amount and flow rates for both the existing and proposed conditions. The impervious percentage factors used for the site-specific land use categories are detailed in Attachment A of the Surface Water Quality Technical Report for the Project, attached as Appendix I-2 to the Draft EIR. Based on the site-specific land uses and impervious percentage factors, the Project Site is approximately 66 percent impervious. (See Draft EIR, Section IV.G.2, Water Resources - Groundwater, page 1428.) Construction of the Project would include some net conversion of existing pervious surfaces to impervious surfaces, which would have the potential to reduce groundwater recharge. Development associated with the proposed Project would result in a net increase in impervious surface to approximately 70 percent of the Project Site. Therefore, the actual increase in imperviousness of the Project Site would be 4 percent. Although there could be a reduction in groundwater recharge due to the overall change in impervious area (4 percent) associated with the proposed Project, from a regional hydrologic perspective, the potential minimal loss in groundwater recharge resulting from the increase in impervious surfaces as a result of development is not considered substantial because any groundwater that exists under most of the Project Site is largely locally perched groundwater due to a majority of the Project Site not overlaying, or having a hydraulic connection with, the San Fernando Groundwater Basin. (“Perched groundwater” is a zone of saturation in a formation that is discontinuous from the water table and the unsaturated zones surrounding this formation; when perched groundwater exists, it is generally because there is not a direct hydrologic communication with the aquifer.) While the maximum possible reduction in infiltration across the entire Project Site as a result of the change in percent imperviousness is estimated at 15 acre-feet/year, essentially the majority
of this potential reduction would occur in the Mixed-Use Residential Area where there is no direct connection with the Basin. Therefore, operation of the Project would not result in demonstrable and sustained reductions of groundwater recharge capacity and a less than significant impact would occur. (See Draft EIR, Section IV.G.2, Water Resources - Groundwater, page 1428.)

Comment No. 12-23

| However, of even greater concern is the fact that a 70 percent increase in impervious surface as a result of the construction of the Project would dramatically increase runoff and contribute to the risk of flooding. [Appendix Q]. This is of extreme concern to Studio City as the location of the Project Site places it within 2 miles of the low point in the San Fernando Valley at the confluence of the Tujunga Wash and the Los Angeles River [Appendix Q-1]. |

Response to Comment No. 12-23

With respect to the comment that increased imperviousness would potentially increase runoff and the risk of flooding, first, as explained in Response to Comment No. 12-22, the overall net increase in imperviousness with the proposed Project is 4 percent, not 70 percent as suggested. In addition, due to the proposed modifications to the on-site drainage system and the incorporation of detention as a project design feature (see Project Design Feature G.1.a-2 on page 1357 of the Draft EIR), there is no increase in peak flow rate with the proposed Project. The peak flow rate measures the highest rate at which stormwater is leaving the Project Site and entering the Los Angeles River Flood Control Channel during a storm event. Since there is no change in peak flow rate with the proposed Project, the Project would not result in a permanent adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow (refer to Section IV.G.1.a, Water Resources – Surface Water – Drainage, of the Draft EIR, and Appendix I-1-1, Hydrology Report, of the Draft EIR).

The comment references Appendix Q to the comment, which is a printout of an entry on the Tujunga Wash from Wikipedia, and Appendix Q-1 to the comment, which consists of excerpts from the City’s Los Angeles River Revitalization Master Plan regarding the Tujunga Wash. The comment expresses concern that the Project will contribute to flooding risk and notes that the location of the Project Site places it within 2 miles of the low point in the San Fernando Valley at the confluence of the Tujunga Wash and the Los Angeles River. As explained in the Draft EIR (see page 1337 of Section IV.G.1.a), the Project Site primarily drains directly to the Los Angeles River Flood Control Channel through an on-site
storm drain system. The Los Angeles River Flood Control Channel is under the jurisdiction of the County of Los Angeles and the U.S. Army Corps of Engineers. According to the Federal Emergency Management Agency Flood Insurance Rate Maps, the Los Angeles River Flood Control Channel would accommodate and contain stormwater associated with a 100-year frequency storm event in the vicinity of the Project Site. The Project Site is within Federal Emergency Management Agency Flood Zone C, which is defined as an area of minimal flooding (see page 1337 of the Draft EIR). As the Draft EIR further explains, the Project Site is not within a flood protection district as designated by Los Angeles County, or an area of special flood hazard as designated in the City of Los Angeles Flood Hazard Map. The Project Site is entirely outside the existing floodplain of the Los Angeles River. Hence, the Project Site is not subject to inundation from 100-year floodwaters (see pages 1337–1338 of the Draft EIR.)

The commenter is also referred to Response to Comment No. 12-22, above.

**Comment No. 12-24**

| Volume IV.G.2 | Page 1427 | Below grade structures associated with the Project extend into the ground water table. Those structures may require permanent dewatering systems. The effect of this permanent dewatering on the existing residential community has not been adequately addressed in the DEIR and we are concerned that it may undermine the adjacent hillside residential area and put those homes at risk of geological damage. |

**Response to Comment No. 12-24**

As described beginning on page 1410 in Section IV.G.2, Water Resources – Groundwater, of the Draft EIR, the Project Site is located in an area with large variations in elevation. Shallow groundwater is encountered along the Los Angeles River Flood Control Channel adjoining the northern portion of the Project Site. Under the remainder of the Project Site, groundwater is limited to joints and fractures in the bedrock materials. Additionally, the Topanga geologic formation beneath a majority of the Project Site is considered non-water bearing, as it does not yield notable quantities of water available for extraction. Recent Alluvium (Qal) located north, west, and in a small area along the southwest edge of Universal City and the Project Site (in the area along the 101 freeway) is considered to be water bearing.

The historical high groundwater in parts of the Project Site has been estimated as close to the surface as 15 feet below ground surface. No permanent dewatering systems
are anticipated with development of the proposed Project. However, if below-ground structures associated with the Project extend into the groundwater table (e.g., subterranean parking), those structures may require permanent dewatering systems. As stated on page 1430 of the Draft EIR, if a dewatering system is necessary, it would be designed and operated in accordance with all applicable regulatory and permit requirements. As described beginning on page 1411 of the Draft EIR, adverse impacts are not anticipated relative to the rate or direction of flow of shallow groundwater from long-term dewatering because the maximum anticipated permanent dewatering rates are anticipated to be 0.9 to 4.0 gpm, and the radius of influence on groundwater is limited. Given the limited radius of influence of dewatering systems and the variations in groundwater conditions at the Project Site and the surrounding area, dewatering at the Project Site would not have an impact on homes in the adjacent hillside residential area.

**Comment No. 12-25**

<table>
<thead>
<tr>
<th>Volume IV.F</th>
<th>Page 1315</th>
</tr>
</thead>
<tbody>
<tr>
<td>Many of the properties located on the Project Site that will be within the City of Los Angeles will be located on liquefaction. Construction of mid-rise and/or high rise buildings up to 80 stories tall on soil that is in a liquefaction zone per ZIMAS should not be permitted [Appendix R].</td>
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</table>

**Response to Comment No. 12-25**

With regard to building heights, the commenter is referred to Response to Comment No. 12-17. The approximate building heights that would be allowed in the Mixed-Use Residential Area under the proposed Universal City Specific Plan are summarized in Table 4 in Section II, Project Description, of the Draft EIR on page 298.

With regard to the potential for liquefaction, on page 1315, the Draft EIR explains that portions of the Project Site are located within a potential liquefaction zone. On page 1319 in Section IV.F, Geotechnical, the Draft EIR analyzes the potential for impacts related to liquefaction on the Project Site and concludes that impacts would be considered significant for areas designated with a high or moderate potential for liquefaction. Therefore, the Draft EIR recommends a mitigation measure for construction in an area of high or moderate potential for liquefaction to reduce this potential impact to a less than significant level. (Draft EIR Section IV.F, Geotechnical, page 1330, Mitigation Measure F-6.) With implementation of the recommended mitigation measure, construction of high or mid-rise buildings in an area of high or moderate potential for liquefaction on the Project Site would result in less than significant impacts.
The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-26**

<table>
<thead>
<tr>
<th>Volume IV.L.2</th>
<th>Page 1855</th>
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</thead>
<tbody>
<tr>
<td>We are concerned about the additional demands for potable and recycled water that will be placed on the DWP if this project is constructed. The water demand for the proposed development is estimated to be 2,131.7 acre-feet per year of potable water, and 351.0 acre-feet of recycled water [Appendix S]. Despite the agreement by NBC Universal that it will provide annual replacement water supplies to the proposed Project, we do not believe that there will be sufficient water for the existing DWP customers, let alone enough to meet the demands that would be generated by this Project. DWP customers are already subject to water rationing [Appendix T] despite the fact that LADWP already has pumping rights in the Central and/or West Coast Basin. Allowing NBC Universal to provide replacement water supplies in the form of leased pumping rights in those same areas will not increase the amount of water available from that source. It will simply give the LADWP an additional source of revenue [Appendix S]. “According to the Los Angeles Times, the state’s water reserves are nearly finished” [Appendix U-l and U-2]. Water is not a renewable resource action to conserve what we currently have and avoid additional demands on the existing resource must be taken seriously. [Appendix U-3]</td>
<td></td>
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</tbody>
</table>

**Response to Comment No. 12-26**

As stated in Section L.2, Utilities – Water, and Appendix N-1-2, Water Supply Assessment, of the Draft EIR, the Project is estimated to increase water demand by 1,249.1 ac-ft/year. Of that demand, 1,003.1 ac-ft/year is calculated to be potable water, and 246 ac-ft/year is calculated to be recycled water. As noted in the Draft EIR, the estimated water demand does not reflect reductions in water usage that would result from the water conservation measures included as project design features and described in Section L.2, Utilities – Water, of the Draft EIR. Water is supplied to the Project Site by the Department of Water and Power (LADWP). The Los Angeles Aqueducts, local groundwater, purchased water from the Metropolitan Water District and recycled water are the primary sources of water supplies for LADWP. In addition, to meet the water demands of the Project, the Applicant would provide replacement water pursuant to the terms of the Surplus Water Supply Augmentation Agreement between the Applicant and LADWP.
Under this agreement, the Applicant would provide water rights to LADWP that LADWP does not currently possess, thus increasing the water supply sources to which LADWP has access. The Surplus Water Supply Augmentation Agreement contemplates that the water rights will be from the Central and West Coast Basins. As indicated in the Water Supply Assessment for the Project, the Central and West Coast Basins are adjudicated groundwater basins. Under the adjudications, LADWP has specified, limited water rights in these basins. The water rights that the Applicant would provide LADWP under the Surplus Water Supply Augmentation Agreement would be in addition to LADWP’s existing rights. As further noted in the Water Supply Assessment, there is an active groundwater rights sales and lease market in the Central and West Coast Basins. Based on the data for the Central and West Coast basins, LADWP determined that the Project demands could be offset through the purchase of annual adjudicated water rights in these basins.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-27**

| Why is the requirement for replacement water different for the portion of the Project in the City (30 years) than it is for the portion of the Project that is located in the County (50 years)? |

**Response to Comment No. 12-27**

Pursuant to California Water Code Section 10910 – 10915, the governing body of each public water system is required to make a determination on Water Supply Assessments for major projects as defined in the State Water Code. The Water Supply Assessment is to consider the availability of water during a 20-year projection. (See California Water Code Section 10910.) Based on its assessment, the Department of Water and Power (DWP) determined that it could meet the water demands of the Project if the Applicant would provide replacement water pursuant to the terms of the Surplus Water Supply Augmentation Agreement. (See the Water Supply Assessment for the NBC Universal Evolution Plan Project included as Appendix N-1-2 to the Draft EIR.) Based on its assessment, the DWP determined that the agreement would be necessary for the City area for 30 years. Because the County portions of the property are outside of the City service area, the DWP determined that the agreement would be necessary for the County area for 50 years.
Comment No. 12-28

Volume IV.L.2
Page 1855

Why have water usage tables been left out of the DEIR?

Response to Comment No. 12-28

The Draft EIR does include information regarding existing water usage conditions. As explained in the Draft EIR, information was obtained from the Los Angeles Department of Water and Power regarding existing domestic water demand on the Project Site. The existing average daily domestic water demand is based on average metered water use at the Project Site from 2004 to 2008 as provided by LADWP. (Page 1867, including footnote 481, of Section IV.L.2, Utilities – Water, of the Draft EIR.) The analysis of potential Project impacts with respect to water includes a table of net new domestic water consumption for the proposed Project and also under the No Annexation Scenario. (Table 160 on page 1876 and Table 161 on page 1879 of the Draft EIR.)

Comment No. 12-29

Please define “reclaimed water” as it is used within the DEIR. Is this really “toilet to tap” water?

Response to Comment No. 12-29

The terms “reclaimed water” and “recycled water” are used interchangeably in the Draft EIR, which describes “reclamation (or recycled water)” as a potential source of water supply where wastewater is treated to a sufficient degree for certain types of uses. reclaimed/recycled water is wastewater that has been highly treated to make it suitable for beneficial reuse. All reclaimed/recycled water undergoes at a minimum, tertiary treatment and disinfection. Recycled water in Los Angeles is used primarily for irrigation and industrial purposes. Recycled/reclaimed water is non-potable and must be conveyed in a separate system from potable water to avoid the possibility of direct human consumption. (Page 1853 of Section IV.L.2, Utilities – Water, of the Draft EIR.) As described in the Draft EIR, water recycling

31 Website www.ladwp.com/ldwp/faces/ldwp/aboutus/a-water/a-w-recycledwater/a-w-rw-general?_adf.ctrl-state=g2giki1pg_4&_afrLoop=172837182227924
and reuse is serving to reduce Southern California’s demand for potable water. LADWP utilizes recycled water produced by four wastewater treatment plants and restores the water to a level of quality specified by the California Department of Health Services before distributing it for landscaping and industrial uses. (Page 1861 of the Draft EIR.)

**Comment No. 12-30**

<table>
<thead>
<tr>
<th>Report by HR&amp;A Advisors, Inc</th>
<th>It is the LAUSD’s objective to a “enable all students to attend schools in their home neighborhoods.”</th>
</tr>
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<tbody>
<tr>
<td>Page 1</td>
<td>None of the following schools: Valley View Elementary School, Bancroft Middle School or Hollywood High School, which have been designated in the DEIR for serving the children of the Project are even located in the San Fernando Valley [Appendix V]. Sending children to those schools will increase traffic and congestion on Barham Blvd., the 101 Freeway and in the Cahuenga Pass.</td>
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<td>Page 5</td>
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</table>

**Response to Comment No. 12-30**

The discussion and analysis of the LAUSD schools likely to serve new students resulting from the Project’s residential uses is contained in Section IV.K.3, Public Services – Schools, of the Draft EIR (pages 1750 et seq.), and the Schools Technical Report, Appendix M of the Draft EIR. The analysis follows City of Los Angeles guidelines for CEQA analysis of school impacts, and focuses on the three schools LAUSD identified as serving the Project Site (Valley View Elementary School, Bancroft Middle School, and Hollywood High School), as noted on page 1753 of the Draft EIR. The proposed Mixed-Use Residential Area is located within LAUSD local district 4, as is the case with the Hollywood Knolls, Hollywood Manor, and portions of the Cahuenga Pass communities. Valley View Elementary School, Bancroft Middle School, and Hollywood High School are the schools that serve local district 4 and, therefore, now serve students in the general vicinity of the proposed Mixed-Use Residential Area.

The comment also references Appendix V to the comment letter, which includes three maps that appear to designate the location of each of the three schools LAUSD identified as serving the Project Site. As described on pages 1753 and 1755 of the Draft EIR, Valley View Elementary School is located approximately 1.4 miles from the Project Site, Bancroft Middle School is located approximately 4.5 miles from the Project Site, and Hollywood High School is located approximately 4.4 miles from the Project Site. See also Figure 209 on page 1754 of the Draft EIR.
The Project’s traffic assignment has been developed using a detailed travel demand forecasting model (the “Universal City Transportation Model”) that was developed for the Study Area using the Southern California Association of Governments’ Regional Transportation Plan 2004 Transportation Model and the City of Los Angeles’ General Plan Framework model as the base. Trip generation rates for the residential uses were calculated using standard rates from the Trip Generation, 7th Edition, a national standard used by the traffic engineering profession. The ITE trip generation rates for residential uses takes into account trips for school commuting.

The Universal City Transportation Model was developed and calibrated/validated to the satisfaction of the City of Los Angeles Department of Transportation. Similar to analysis conducted with the Southern California Association of Governments’ regional model, the analysis accounts for the unique nature of the street system within and around the Study Area, the traffic conditions on both the freeway and street networks, and the location of various land uses (including schools) within the Study Area. The traffic volumes were assigned to the intersections and streets after a thorough investigation of traffic patterns and in collaboration with the City of Los Angeles Department of Transportation and Caltrans. The commenter is referred to Appendix H of the Transportation Study (see Appendix E-1 of the Draft EIR) that provides a detailed description of the Universal City Transportation Model’s development and validation process.

**Comment No. 12-31**

<table>
<thead>
<tr>
<th>Based on near-term LAUSD enrollment and capacity projection data, the Project’s cumulative impact on school facilities would be considered <strong>significant</strong> and adverse.</th>
</tr>
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<tbody>
<tr>
<td>We do not agree that payment of a school facility mitigation fee by the developer is appropriate mitigation. As was required of the developers of the Playa Vista Project the developer should be required to dedicate land for the construction of schools to serve this community. [Appendix W-I] Please not [sic] that the August 2, 2007 letter from LAUSD used in the preparation of the DEIR shows the use of tracts and year-round schools [Appendix W]. As the LAUSD has discontinued the use of either of those schedules the adverse impacts of the Project on existing schools would be even greater.</td>
</tr>
</tbody>
</table>
Response to Comment No. 12-31

As referenced in Section IV.K.3, Public Services – Schools, on page 1751 of the Draft EIR, under the provisions of Senate Bill 50, a project’s impacts on school facilities are fully mitigated via the payment of the requisite new school construction fees established pursuant to Government Code Section 65995.

This comment suggests land dedication for schools rather than payment of the developer fee mitigation measure contained in the Draft EIR, and raises certain questions about the LAUSD data used in the Draft EIR’s analysis of school impacts. The Project’s potential impacts on seating capacity in the LAUSD schools likely to serve new students resulting from the Project’s residential uses is contained in Draft EIR Section IV.K.3, Public Services - Schools (page 1750 et seq.) and the Schools Technical Report attached to the Draft EIR as Appendix M. The analysis follows City of Los Angeles guidelines for CEQA analysis of school impacts and relies on LAUSD data, including a five-year projection of school seating capacity and enrollment for the three schools LAUSD identified as serving the Project Site (Valley View Elementary School, Bancroft Middle School, and Hollywood High School). As noted in the Draft EIR, future school capacity determinations are based on LAUSD’s five-year projections, which constitute the best available information (i.e., the LAUSD does not forecast beyond a five-year time frame).

Using student-generation rates provided by LAUSD, the Draft EIR concludes that the Project’s residential units would generate approximately 319 elementary students, 156 middle school students, and 161 high school students, or a total of 636 additional Los Angeles Unified School District students. (Draft EIR, Section IV.K.3, pages 1762–1763.) The Draft EIR concludes that when these enrollment demand impacts are compared with LAUSD projections of future enrollment and seating capacity in the relevant schools, Valley View Elementary School, one out of the three schools serving the Project Site, would be over capacity by the time Project buildout is achieved. As such, the Project would cause a significant impact to the capacity of this school, but not at Bancroft Middle School or Hollywood High School, where there is projected to be surplus seating after accommodating Project-generated students. (Draft EIR, Section IV.K.3, page 1762.)

Nevertheless, LAUSD is authorized under State law to levy a fee on the construction of the Project’s new residential units, commercial development, and parking structures for the purpose of funding the construction or reconstruction of school facilities. LAUSD’s current fee is $3.87 per square foot of new residential floor area, $0.47 per square foot of non-residential development, and $0.09 per square foot of a parking structure. Therefore, requiring the mandatory payment of school fees in conformance with the Leroy F. Greene School Facilities Act of 1998, more commonly referred to as Senate Bill 50, would mitigate
the Project’s potential school impacts under CEQA. No additional mitigation is required. (Draft EIR, Section IV.K.3, pages 1765–1767.)

The comment also references an August 2, 2007, letter from LAUSD (included in Appendix W to the comment letter) that shows the use of tracts and year-round schools and suggests that Project impacts are greater because LAUSD has discontinued the use of such schedules. However, the Draft EIR analysis was based on updated information provided by LAUSD in an August 19, 2008, letter, included in the Draft EIR as Attachment B to the Schools Technical Report at Appendix M to the Draft EIR. The updated information from LAUSD showed Valley View Elementary School and Bancroft Middle School operating on a single-track calendar. Hollywood High School was shown as operating on a 3-track calendar in school year 2007–2008, but expected to move to a single-track calendar with relief from Bernstein High School opening in the third quarter of 2008. No overcrowding was projected in the future. Helen Bernstein High School opened in the fall of 2008.

In addition, the comment references the Playa Vista project and a requirement for that project that the developer dedicate land for the construction of schools to serve the community. The comment references Appendix W-1 to the comment, which is a copy of an email between a Studio City Neighborhood Council Board member and a City Council office staff member regarding a mitigation measure required by LAUSD for the Playa Vista project of a 4-acre site for a school. As noted in the Final EIR for the Central Region Elementary School No. 22 (State Clearinghouse No. 2008041088) dated February 2009, the school project site was offered by Playa Capital Company, LLC in accordance with the Conditions of Approval for development of the First Phase Playa Vista Project approved by the City of Los Angeles in 1993 and modified in 1995. (Central Region Elementary School No. 22 Final EIR, pages ES-1 and 2-13.) The Playa Vista project is a different project located in another area of the City that underwent its own environmental review and discretionary approval processes. As noted above, compliance with the provisions of Senate Bill 50 fully mitigates potential school facilities impacts. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-32

| Master Land Use Application | The Developer is requesting an amendment to the Mulholland Scenic Parkway Specific Plan as proposed in Attachment B to delete a portion of the project site from within the Mulholland Scenic Parkway Specific Plan [Appendix X]. We do not support this request as the proposed usage of that area based upon the proposed Universal City Specific Plan permitted uses which would include a [sic] |
Response to Comment No. 12-32

For informational purposes, the Mulholland Scenic Parkway Specific Plan area is divided into two areas—the Inner and Outer Corridors. The boundaries of these corridors are determined via distance from the Mulholland Scenic Parkway right-of-way, with the outermost boundary of the Outer Corridor extending 0.5 mile outward from the Mulholland Drive right-of-way. Mulholland Drive reaches its eastern terminus in the Project area where it turns from a primarily east-west road to a north-south road as it connects with Cahuenga Boulevard. Based on these conditions, the strict application of the Outer Corridor boundary places the 8-lane Hollywood Freeway and areas on the north (far) side of the Freeway within the boundaries of the Mulholland Scenic Parkway Specific Plan (see Figure 28 on page 433 of the Draft EIR). As concluded on page 525 of the Draft EIR in Section, IV.A.1, Land Use – Land Use Plans/Zoning, since the context of the Project Site is dominated by the Hollywood Freeway and is not contiguous with other areas within the Mulholland Scenic Parkway Specific Plan Outer Corridor, land use impacts with respect to the intention of the Mulholland Scenic Parkway Specific Plan to preserve the visual quality of natural open space would be less than significant. The analysis goes on to further conclude that the proposed Project would not be inconsistent with existing Mulholland Scenic Parkway Specific Plan policies to preserve the existing residential character of areas along and adjoining the Mulholland Drive right-of-way, to protect all identified archaeological and paleontological resources, and to assure that land uses are compatible with the parkway environment. Therefore, the impact of the Project with respect to the Mulholland Scenic Parkway Specific Plan policies and regulations for the Outer Corridor are concluded in the Draft EIR to be less than significant.

As discussed on page 1087 in Section IV.D, Visual Qualities, of the Draft EIR, some Project structures or signs may be visible from the Mulholland Ridge, the overall character of the area and the Project Site as seen from this height and distance would appear similar to its current conditions; there impacts to visual character from the Mulholland Ridge would be less than significant. Additionally, the proposed Project development would not be located on or proximal to any designated Prominent Ridge as identified and defined in the adopted Mulholland Scenic Parkway Specific Plan on maps 1B through 6B. As discussed on page 1087 in Section IV.D, Visual Qualities, of the Draft EIR, the primary view resources available from the Mulholland Ridge geographic area are panoramic views of the San Fernando Valley and the Verdugo Mountains in the background. Since the Project would
not result in the substantial view coverage of a prominent resource, Project impacts from the Mulholland Ridge geographic area would be less than significant.

Based on the analysis and conclusions presented above, the Draft EIR concludes that the deletion of the small portion of the Project Site from the boundaries of the Mulholland Scenic Parkway Specific Plan would be less than significant.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-33**

| DEIR | We could find no recognition of the existence of the VCBC Specific Plan in the DEIR. However, the Project will significantly impact the VCBC Specific Plan area [Appendix Y-1]. We support the findings of the VCBC Specific Plan Review Board as expressed in their letter [Appendix Y-2] and we request specific compliance with all of the provisions of the VCBC Specific Plan. |

**Response to Comment No. 12-33**

The Ventura–Cahuenga Boulevard Corridor Specific Plan designates the land area on either side of Ventura Boulevard and Cahuenga Boulevard West as Neighborhood and General Commercial due south of the Project Site. The only portion of the Project Site located within the boundaries of the Ventura–Cahuenga Boulevard Corridor Specific Plan is the proposed Universal City Specific Plan Southern Entry Point Sign (Sign District 2C) at the intersection of Universal Studios Boulevard and Cahuenga Boulevard just south of the 101 Freeway. Sign District 2C will no longer be included in the proposed Universal City Specific Plan. Potential impacts related to the proposed Project signage are discussed in the relevant sections of the Draft EIR (e.g., Section IV.D, Visual Qualities; IV.E.2, Light and Glare – Artificial Light; etc.). The proposed Southern Entry Point Sign (Sign District 2C) will no longer be included in the proposed Universal City Specific Plan. The Project does not propose any modification of the Ventura–Cahuenga Boulevard Corridor Specific Plan.

**Comment No. 12-34**

| Volume I. Introduction/Summary page 42 | Throughout the DEIR the Island Neighborhood which is located in Studio City and is under the jurisdiction of the Studio City Neighborhood Council is incorrectly referred to as either the Island Community or the Island Residential Area [Appendix Z]. |
Response to Comment No. 12-34

When the Draft EIR references the Island Community or the Island residential area, it is referring to the Island neighborhood bounded on the north by the Los Angeles River Flood Control Channel, on the east by Lankershim Boulevard, and on the south and west by Valleyheart Drive. The manner in which the area is referenced does not affect the environmental analysis in the Draft EIR.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-35

| DEIR                                                                 | It appears that throughout the DEIR whenever an intersection already has existing LOS of E or F, then the DEIR determines that there is no significant impact from the project on that intersection. Every one of these impacts should be listed in the unavoidable impacts section of the DEIR which is VI. Summary of Significant and Unavoidable impacts. Failure to include them significantly understates the Significant and Unavoidable Impacts of the Project. |

Response to Comment No. 12-35

As stated in the City of Los Angeles CEQA Thresholds Guide and the Los Angeles Department of Transportation’s Traffic Study Policies and Procedures (March 2002, revised August 2003), the Project results in a significant impact at intersections based on the incremental Project traffic at a particular intersection and the operating conditions of that location as applied to the appropriate significance threshold (see below). Therefore, contrary to the suggestion in the comment, the Draft EIR does not ignore potential impacts at an intersection merely because it is operating at Level of Service E or F under existing and/or future conditions. As explained in Section IV.B.1.3.b.(1)(a) of the Draft EIR and Chapters I and IV of the Transportation Study:

“(i) Signalized Intersections

The City of Los Angeles CEQA Thresholds Guide (page L.1-3) and Los Angeles Department of Transportation criteria state that a project would normally have a significant impact on signalized intersection capacity if the project traffic causes an increase in the V/C ratio at the intersection based on the following sliding scale:
This threshold has been utilized to evaluate intersection capacity at all signalized study intersections. In addition, for intersections wholly or partially located in a jurisdiction other than the City, the significance threshold utilized by that jurisdiction was also analyzed for informational purposes to determine whether additional significant impacts would be identified through application of that threshold. The significance thresholds used by other jurisdictions are described below for informational purposes."

**Comment No. 12-36**

| Volume IV.B.1 Traffic Page 733 | In numerous locations throughout the DEIR there is a reference to a street “Studio City Place.” Table 17 on page 733 includes a reference to Studio City Place and Ventura Blvd. There is no reference to this street on ZIMAS [Appendix AA]. How can this intersection have been analyzed if it does not exist. [sic] |

**Response to Comment No. 12-36**

The comment is referring to the intersection of Studio City Place & Ventura Boulevard (Intersection 7). Studio City Place is the name of the driveway serving the retail strip mall on the north side of Ventura Boulevard between Eureka Drive and Arch Drive. This driveway is not a designated street and, therefore, not identified on ZIMAS. However, the driveway is labeled with a “Studio City Place” street sign at its intersection with Ventura Boulevard.

**Comment No. 12-37**

| Volume IV.B.1 Page 619 and 665 | The Project’s residences are 391 acres away from the Redline Metro Station located on the west side of Lankershim Blvd in Studio City. The DEIR does not recognize that this station is located in Studio City. Further, we do not agree that the Project should receive traffic mitigation credits for proximity to this station. We do not support the sharing of any mitigation measures with the proposed Metro Universal |
Response to Comment No. 12-37

The comment incorrectly states that the residential portion of the proposed Project would be located 391 acres away from the Universal City Metro Red Line Station. The Project Site has an irregularly shaped overall area of 391 acres. The residential development proposed as part of the Project would be located on the eastern edge of the Project Site approximately one mile from the University City Metro Red Line Station. As described in Mitigation Measure B-2 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, a new shuttle service is proposed that would connect the residences to the Universal City Metro Red Line Station.

As noted in Appendix K on Pages K-1 to K-4 of the Transportation Study, numerous studies across California and nationally, have found much higher than a 20 percent trip credit for residents living near rail stations. The 20 percent trip reduction assumed in the Draft EIR and included as Appendix K of the Transportation Study presents a conservative estimate.

Additionally, as noted in City of Los Angeles Department of Transportation’s Assessment Letter dated April 2, 2010 (see Appendix E-2 of the Draft EIR), the Project’s trip generation would be monitored by the City of Los Angeles Department of Transportation to ensure effective participation and compliance with the TDM goals.

See Response to Comment No. 12-14 above regarding the sharing of credits for traffic improvements. The commenter is also referred to Topical Response No. 4: Transportation Demand Management Program (see Section III.C, of this Final EIR), for further information.

Comment No. 12-38

Volume 1.
Introduction I
Summary
Page 1

We are not in favor of the proposed annexation and detachment. That proposal results in the removal of revenue generating commercially zoned property from the City of Los Angeles. It also results in the incorporation of significant additional residential property into the City which will result in a strain on the already overtaxed infrastructure and other City resources such as police and fire services [Appendix CC].
Response to Comment No. 12-38

The comment does not address the environmental analysis of the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

With respect to the comment regarding loss of revenue, in addition to property tax revenue, the City would also derive substantial annual revenues from other taxes associated with the Project’s new housing in the City of Los Angeles, including household-related sales tax and utility tax; real estate transfer tax from periodic resale of the condominiums, among others; and one-time revenues from construction-related taxes (e.g., contractor gross receipts tax, construction materials sales tax, residential development tax, and dwelling unit construction tax) and from the real estate transfer tax on initial sale of the condominium units. The fiscal implications of the proposed annexation and detachment actions for both the City and the County would be considered in the annexation and detachment proceedings with LAFCO.

With regard to City infrastructure and resources, the Draft EIR analyzes the potential impacts to public services and utilities in Sections IV.K, Public Services, and IV.L, Utilities, of the Draft EIR. As discussed in the Draft EIR, the Project would provide various infrastructure improvements as project design features and mitigation measures. The commenter is referred to Sections IV.K, Public Services, and IV.L, Utilities, for further information regarding potential impacts and project design features and mitigation measures.

The comment references Appendix CC to the comment, which includes two pages from the Introduction/Summary section of the Draft EIR, as well as Figure 3 from the Draft EIR, which depicts the existing and proposed jurisdictional boundaries. The comment is noted and will be incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-39

<table>
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<tr>
<th>Volume IV.B.I</th>
<th>CEQA required agencies to compare the potentials [sic] <strong>significant</strong> impacts of proposed projects to an environmental baseline which CEQA provides shall “normally” consist of environmental conditions as they exist when environmental review is commenced. Throughout the DEIR we noted that the environmental impacts are evaluated after giving effect to future events. In particular this skews the results of the impacts with respect to traffic. We request that the DEIR be revised to conform to the ruling of the California Court of Appeal Sixth District</th>
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<td>Page 747, 772, 779, 782,796 and 797</td>
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Response to Comment No. 12-39

The commenter is referred to Appendix FEIR-2, Sunnyvale Analysis, of this Final EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-40

| Volume IV.N.2 Housing Table 192 Page 2073 | Throughout the DEIR the applicant takes credit for compliance with the LEED rating system. We are concerned that the LEED certification does not make buildings save energy. |

Response to Comment No. 12-40

The comment incorrectly states that the Project “takes credit for compliance with the LEED rating system.” The Project does not “take credit” for compliance with the U.S. Green Building Council’s (USGBC) Leadership in Energy and Environmental Design (LEED®) green building certification system. However, as indicated on Table 192, on page 2073 of the Draft EIR, noted in the comment, the Mixed-Use Residential Area of the Project would seek LEED-ND® (Neighborhood Development) certification.

With regard to energy conservation, as described in Section IV.L.4, Utilities – Electricity, and Section IV.O, Climate Change, of the Draft EIR, the Project includes various project design features that will reduce the electrical consumption and demand of the Project. For example, the Project would incorporate energy conservation measures to exceed Title 24 (2005) requirements by 15 percent (see Project Design Feature L.4-5). The Project would also install efficient lighting and lighting control systems; light-colored, “cool” roofs; energy-efficient heating and cooling systems, appliances (e.g., Energy Star) and equipment, and control systems; LEDs for private on-site traffic and street lighting; and use efficient pumps and motors for pools and spaces within the Mixed-Use Residential Area (see Project Design Features L.4-6 through L.4-10). The Draft EIR’s projection of the Project’s electrical consumption and demand does not account for the Project’s incorporation of these energy conservation measures; therefore, the projections of consumption and demand are conservatively overstated.
Comment No. 12-41

Volume VII
Significant and
Irreversible
Environmental
Changes Page
2441

The commitment of nonrenewable resources required for the type and level of proposed development would limit the availability of these resources for future generations for others uses. We do not agree with the conclusion that “the use of such resources would not be considered significant.” The Project should be reduced in scale until it is deemed to have no adverse impact on the environment [Appendix EE].

Response to Comment No. 12-41

With regard to significant and unavoidable impacts, the commenter is referred to Response to Comment Nos. 12-5 and 12-7, above. Issues related to significant and irreversible changes attributable to the Project are analyzed in Section VII., Significant and Irreversible Environmental Changes, of the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-42

Volume II Project Description page 263 and 292

There are two major existing hotels within the Project Site and there are many smaller hotels and motels within one mile of the Project Site. We have contacted the major hotels and been advised that their average occupancy is between 69% and 75%. There is no specific information about the proposed 500 room hotel within the DEIR. We do not know the specific location of the proposed hotel. The developer should not be granted blanket approval for this hotel. Hearings should be held when specific information about the hotel is available.

Response to Comment No. 12-42

The comment incorrectly states that there are two major hotels on the Project Site. The Hilton and the Sheraton are not located within the Project Site. The comment refers to occupancy rates for existing hotels in the Project area. As such, this is not a comment addressing the environmental analysis in the Draft EIR, but it is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Additionally, the comment requests information regarding the location of the Project’s proposed hotel. The potential locations of the hotel are shown on Exhibit 8 (Universal Studios Specific Plan Hotel Permitted Locations Map) of the proposed County Specific Plan. Proposed regulations related to the hotel are included in Section 10 and Exhibit 7 (Conditions for Hotel Use) of the proposed County Specific Plan. The proposed County Specific Plan is Appendix A-2 to the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-43**

Volume IV.E.3 Glare Page 1157

We are unable to locate the maps showing the impact of cumulative shadows from the Project that would result in Spring or Summer. The DEIR concludes that fewer shadows would actually than would be shown by the analysis [sic] [Appendix FF]. We believe that the analysis is incomplete without the maps referred to above.

**Response to Comment No. 12-43**

Cumulative shadow figures were not provided in the Draft EIR because fall and winter shadows represent the most impactful shadows. During the winter, when the period of sunlight is shorter and the sun is lower in the sky, shadows are uniformly longer than in other seasons for the same time of day. Conversely, summer shadows are the shortest. Therefore, the figures provided in the Draft EIR illustrate the most impactful scenario(s), thus the Draft EIR provides a conservative analysis. The commenter is also referred to Topical Response No. 3: Defining the Proposed Project (Section III.C, Topical Responses, of this Final EIR), with regard to the Metro Universal Project, which is no longer proposed.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-44**

We have grave concern that the portion of the Los Angeles River adjacent to the Project Site is show [sic] on the maps in the DEIR as being continually in the shadows. That result is not compatible with the LA RIO Master Plan [Appendix GG].
Response to Comment No. 12-44

The proposed River Improvement Overlay (“RIO”) district is a proposed special use district that would implement the Los Angeles River Revitalization Master Plan, establishing guidelines for both private property and public rights-of-way (see page 431 of Section IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft EIR). As explained in more detail in the Draft EIR, the Project furthers the goals and objectives of, and would not be inconsistent with, the City River Revitalization Master Plan (see pages 523–524 of the Draft EIR). Additionally, the Project’s consistency with the Los Angeles County River Master Plan is discussed in Section IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft EIR, beginning on page 496.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-45

| Project Mailers | We are concerned that the Project mailers mislead the stakeholders by indicating that 43,000 jobs will be created. The vast majority of these jobs (31,000 jobs) will be temporary construction jobs projected to be generated over the 20 year life of the project [Appendix HH]. |

Response to Comment No. 12-45

The Draft EIR includes projections of the number of direct, indirect, and induced jobs that would be associated with Project construction and annual operations upon construction completion. Those projections include 16,559 jobs associated with Project construction, and 14,838 “multiplier-effect” jobs, for a total of 31,387 jobs in the Los Angeles County economy related to Project construction. (Draft EIR, Section IV.N.1, Employment, Housing and Population – Employment, page 2042; and Appendix P.) The Draft EIR also includes a projection that annual operation of the completed Project would directly result in 12,115 total jobs in the Los Angeles County economy, consisting of 5,193 net new jobs on-site, another 1,718 jobs associated with new household spending, for a total of 6,911 direct Project jobs, plus another 5,204 “multiplier-effect” jobs. (Draft EIR, IV.N.1, page 2051; and Appendix P.)

The comment refers to information about Project-generated jobs that was contained in letters from the Project Applicant to Project neighbors, attached to the comment as Appendix HH. The information in the referenced letters is consistent with the employment projections discussed in the Draft EIR, and the letters clearly state that the 43,000 projected jobs include jobs during construction and operation.
Comment No. 12-46

The mailer indicates that 12,000 new full and part time jobs will be generated. What types of jobs are those? It indicates that $26 million annually in new tax revenues will be generated. How much of that will actually trickle down to the City of Los Angeles? Almost all of the revenue generating commercial development will be in the County, while all the strain on infrastructure and governmental services will result from the residential development in the City.

Response to Comment No. 12-46

The comment refers to information about Project-generated jobs and tax revenues that was contained in letters from the Project Applicant to Project neighbors. As such, this is not a comment addressing the environmental analysis in the Draft EIR, but it is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

With respect to the question regarding new tax revenues the commenter is referred to Response to Comment No. 12-38.

Comment No. 12-47

One of the mailers indicates that the developer will invest $100 million in transit solutions throughout the City that could unlock over $200 million in Federal and State Funds. Another mailer indicates that $100 million dollars will be invested to accelerate local and regional transit improvements. Please specifically delineate by traffic improve [sic] the location and amount of each such improvement that adds up to both the $100 million and $200 million.

Response to Comment No. 12-47

The comment refers to information on transportation improvement costs that were contained in letters from the Project Applicant to Project neighbors. As such, this is not a comment addressing the environmental analysis in the Draft EIR, but it is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
The Project would be required to implement all of the transportation project design features and mitigation measures required as part of the Project’s approvals, regardless of the cost of these measures. The $100 million cost estimate is an engineering estimate of the proposed transportation improvements developed for informational purposes only and is not mentioned in the Draft EIR or the Transportation Study as the Project approval is tied to the proposed improvements and not the estimated costs. In addition to the Project transportation project design features and mitigation measures, the Project has proposed to fund the environmental documents for the proposed US 101 corridor regional improvements described in Appendix O of the Transportation Study (see Appendix E-1 of the Draft EIR). This funding and documents would assist Caltrans in getting the proposed improvements ready to start construction which is required for State and federal funding. However, as noted in Appendix O of the Transportation Study, the Project’s traffic impact analysis does not account for any benefits from the proposed US 101 regional improvements. Therefore, the significant impacts noted in the Draft EIR do not account for benefits resulting from the implementation of the regional improvements described in Appendix O of the Transportation Study.

As stated in Chapters V and VI of the Transportation Study (see Appendix E-1 of the Draft EIR): “The regional highway system improvement program (‘US 101 corridor improvements’) presented in this appendix adds to the Project’s funded regional improvement program presented in Chapter V. Since these US 101 corridor improvements currently do not have committed funding, the analysis presented in Chapter V conservatively assumes that these improvements would not be in place in year 2030.”

**Comment No. 12-48**

| Please note that the Measure R Project Tracker for the City of Los Angeles shows that no Measure R funds are allocated for the south-east San Fernando Valley [Appendix II and II-I]. |

**Response to Comment No. 12-48**

The Project’s transportation analysis does not assume any credit for future transit projects funded by Measure R in the San Fernando Valley or other locations in the Los Angeles region. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-49**

| At a south-east valley neighborhood councils’ town hall meeting held in February 2008, Doug Failing, then of CalTrans [sic] and now of |

City of Los Angeles  NBC Universal Evolution Plan
Final Environmental Impact Report  July 2012

Page 620
Metro, stated that there [sic] no funds available for any CalTrans [sic] improvements in the south-east valley.

Response to Comment No. 12-49

As discussed in Response to Comment No. 12-47, the Project has proposed to fund the environmental documents for the proposed US 101 corridor regional improvements described in Appendix O of the Transportation Study (see Appendix E-1 of the Draft EIR). This funding and documentation will assist Caltrans in getting the proposed improvements ready to start construction which is required for State and Federal funding. However, as noted in Appendix O, the Project’s traffic impact analysis does not account for any benefits from the proposed US 101 regional improvements. Therefore, the significant impacts noted in Chapters V and VI of the Transportation Study do not account for benefits resulting from the implementation of the regional improvements.

Comment No. 12-50

One of the mailers indicates that a new north/south road will be built that will help alleviate traffic on Barham. The fact of the matter is that, all that road will do, is move traffic within the new proposed residential area. The residents of that area will still need to exit the development on Barham or travel though the Universal Studios property past the theme park and hotels to exit on Lankershim Blvd. at an intersection which is already a choke point.

Response to Comment No. 12-50

As noted by the comment and discussed in Section IV.B.1.5.b.(2)(a) of the Draft EIR, the Project is proposing a new public roadway, the “North-South Road,” which would be built within the Project Site and travel north/south, parallel to Barham Boulevard. The North-South Road would be connected between Lakeside Plaza Drive on the north and Buddy Holly Drive (the US 101 frontage road) on the south, thereby providing a north-south Modified Secondary Highway connection through the Project Site. The North-South Road would provide four travel lanes along its length during peak hours and, therefore, alleviate traffic congestion along Barham Boulevard and the intersection of Barham Boulevard & Lakeside Plaza Drive/Forest Lawn Drive (Intersection 55).

The comment is correct in stating that traffic from the North-South Road would exit the northern part of the Project Site on Barham Boulevard at Forest Lawn Drive. However,
the comment is incorrect in stating that at the south end, traffic from the North-South Road would travel through Universal Studios Boulevard and exit on Lankershim Boulevard. As noted above, the North-South Road would connect with Buddy Holly Drive to the south and which would also permit exiting to Cahuenga Boulevard (West) via the Universal Studios Boulevard Bridge.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-51**

| Project Mailers | It should be noted that modernization of studio facilities, while important to the future of studio production, often results in a reduction in the number of studio jobs as technological advances reduce the number of people needed to operate equipment. The flyers indicate that 35 acres of open space, parks and trails will be created. However, analysis of the provisions of the proposed Specific Plans reveals that many of the sites designed as open space do not have to be open space at all. |

**Response to Comment No. 12-51**

The comment that modernization of studio spaces may result in the reduction of studio jobs itself does not address the environmental analysis in the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. The Draft EIR estimates that the Project’s net new floor area for film and television production, studio office, and other related office floor area would generate a net increase of 3,415 full-time and part-time jobs. (Draft EIR, Table 186, page 2044, and Draft EIR Appendix P.)

As described in the Draft EIR (Section II, Project Description, pages 309–313), the proposed Universal City Specific Plan includes the creation of three open space districts that would provide a total of approximately 35 acres of open space with a variety of open space uses in designated areas within the Mixed-Use Residential Area. Open Space District No. 1 is approximately 22 acres and provides for limited parks and recreation uses, public art, exercise stations, drinking fountains, landscaping, victor/community gardens, and infrastructure with minor ancillary above-ground equipment that is screened from view of Existing Off-Site Residential Uses. No new floor area is permitted in Open Space District No. 1. Open Space District No. 2 is approximately 7 acres in the southeastern portion of the Mixed-Use Residential Area. The purpose of Open Space District No. 2 is to allow for
limited development and recreation uses. Open Space District No. 2 is located adjacent to Barham Boulevard and the US 101 freeway and Cahuenga Boulevard. It is also located proximate to off-site utility infrastructure. Given its location, it is an appropriate location on the Project Site for potential utility and public service facilities. Therefore, in addition to park and recreational facilities, Open Space District No. 2 would allow for up to 3 cellular facilities, up to 20,000 square feet of public services facilities and up to 5,000 square feet of maintenance storage facilities. Open Space District No 3 is approximately 6 acres within the Mixed-Use Universal City District. The purpose of Open Space District No. 3 is to promote a wider range of recreational activities and amenities for the residents and guests of the Mixed-Use Residential Area including, for example, tennis courts, swimming pools, interpretive/educational facilities, restaurants, and outdoor dining facilities. The proposed permitted uses in the Open Space Districts are consistent with open space and park areas.

Comment No. 12-52

STUDIO CITY NEIGHBORHOOD COUNCIL COMMENTS ON PROPOSED UNIVERSAL CITY SPECIFIC PLAN DEIR APPENDIX A-1

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<td>4</td>
<td>3</td>
<td>The proposed City and County Specific Plans provide a framework for the continued use and development of the Project Site. Specifically, the proposed Universal City Specific Plan would regulate the development of various studio production and commercial uses, as well as new residential dwelling units within the jurisdictional boundaries of the City. The proposed Universal Studios Specific Plan would regulate the enhancement of existing studio production facilities, entertainment facilities (Universal Studios Hollywood and Universal City Walk) and Los Angeles City Specific Plans are adopted with input from the stakeholders of the effected [sic] community in an effort to establish regulations, standards, procedures, and guidelines which will preserve and enhance community aesthetics which are generally more restrictive in nature than the provisions of the Municipal Code. A specific plan is developed by the community. Therefore, by definition, the stakeholders of the community plan area have extensive involvement in developing each of the provisions of the plan. Such provisions are intended to set forth standards to be adhered to which are</td>
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<td>new entertainment venues, hotel and office uses.</td>
<td>protective of the scale and character of the area. The process for development and adoption of specific plans includes outreach to the surrounding communities. The specific plans that have been included as part of the DEIR have been developed in a vacuum. The standard city process for development and implementation has not been followed.</td>
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<td>4</td>
<td>3</td>
<td>The proposed City and County Specific Plans continued.</td>
<td>The provisions of these specific plans have been drafted in such a way that they will actually prevent the residents that will inhabit the homes once they are built from having input into the planning process. The Universal City Specific Plan provides [sic] incorporates several zoning exceptions to the height requirements. We object to the circumventing of the planning process by including the proposed specific plans with their numerous changes to existing zoning through their inclusion in the DEIR.</td>
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**Response to Comment No. 12-52**

The comment includes a reference to text on page 4, Section I, Introduction/Summary, of the Draft EIR that generally describes the proposed City and
County Specific Plans, and the comment appears to be directed toward the process for the development of the proposed Universal City Specific Plan. The proposed City and County Specific Plans are two elements of the overall Project and are discussed in the Project Description to provide a comprehensive and complete Project Description for analysis in the Draft EIR. The public has an opportunity to comment on all aspects of the Project, including the process for the consideration and development of the Specific Plans. The public may comment on the Draft EIR, as well as during the public hearings that the City and County will hold prior to making any decision whether to approve the Project, including the proposed specific plans.

Consistent with CEQA requirements, public participation in the EIR preparation process also occurred during the scoping period for the EIR. In July 2007, the City filed and circulated for a 30-day public review period a Notice of Preparation that a Draft EIR was going to be prepared and to allow the public to provide input on the scope of the Draft EIR. Consistent with CEQA requirements, public participation in the EIR preparation process also occurred during the scoping period for the EIR. In addition, a public scoping meeting was held on August 1, 2007. Based on public comments and an Initial Study of the Project’s potential environmental issues, the Draft EIR analyzed 15 potential impact areas.

Consistent with the requirements of CEQA, the Draft EIR was submitted to the State Clearinghouse, Office of Planning and Research, and was originally circulated for public review for a 61-day period, or 16 days more than the CEQA-required 45-day review period. This 61-day comment period began November 4, 2010, and ended January 3, 2011. In response to requests to extend the review period, on November 18, 2010, the comment period was extended by an additional 32 days to February 4, 2011. Thus, the Draft EIR was circulated for a 93-day public review period, which is more than double the 45-day public review period required by CEQA Guidelines Section 15105 when a Draft EIR is submitted to the State Clearinghouse for review by state agencies. In addition, a public comment meeting was held on December 13, 2010.

The comment does not address the environmental analysis in the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
**Comment No. 12-53**

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<td>6, 7 &amp; 8</td>
<td>Adoption of the proposed Universal City Specific Plan would override 29 provisions of the Municipal Code.</td>
<td>These provisions will permit the proposed development to dramatically increase the density of the area. The proposed project requests mixed use development (residential and limited neighborhood commercial serving the residential development), including a range of residential types, small lot subdivision and air space lots (with accompanying design guidelines) as well as production related facilities and studio office uses in the western portion of the project site. This will also result in the removal of protected trees. (page 1 of Attachment B of the City Master Land Use Permit Application) (Exhibit 1)</td>
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**Response to Comment No. 12-53**

The comment notes that the proposed Universal City Specific Plan would supersede certain provisions of the Los Angeles Municipal Code and provide alternative regulations. Section 1.2.B of the proposed Universal City Specific Plan states that “[W]henever provisions of [the Universal City] Specific Plan differ either in being more restrictive or less restrictive from provisions contained in the [Los Angeles] Municipal Code or other relevant ordinances, [the Universal City] Specific Plan shall supersede those other provisions. Whenever [the Universal City] Specific Plan is silent, the provisions of the Municipal Code or other applicable ordinances shall apply.” This is a common provision included in the City’s various adopted specific plans.

The potential impacts associated with the Project’s proposed increase in density are analyzed throughout the Draft EIR, including, for example, Physical Land Use (Section IV.A.2), Aesthetics (Section IV.D), Noise (Section IV.C), and Traffic (Section IV.B.1). With regard to the removal of protected trees, potential impacts are analyzed in Section IV.I, Biota. As discussed on pages 1585–1588 of Section IV.I, Biota, of the Draft EIR, the
analysis of impacts on protected trees represents a conservative analysis and project design features and mitigation measures have been developed assuming the maximum potential tree impact numbers. The actual tree impact numbers may be lower than anticipated, once final grading plans are developed. As discussed on pages 1585–1586 of the Draft EIR, with implementation of the Protected Tree regulations in the proposed City Specific Plan and Mitigation Measure I-4, which includes tree protection and enhancement measures from pre- to post- construction, potential impacts would be reduced to a less than significant level. See also Response to Comment No 12-3. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-54**

| 5 | Exhibit 1a | The proposed development anticipates the annexation of approximately 76 acres (primarily within the back lot area) from the unincorporated County into the City. | This will have the effect of placing all of the proposed residential development within the City. This proposed increase in density is not compatible with the current scale and character of the surrounding community. |

**Response to Comment No. 12-54**

Population density is discussed in Section IV.N.3, Employment, Housing and Population – Population, of the Draft EIR, pages 2085 and 2088–2090. The Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan Generalized Land Use Map designates a variety of land uses within proximity of the Project Site, including open space, single-family residential, multiple-family residential, and commercial uses. Consistency with the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan’s Residential Goals and Objectives is discussed on pages 505–508 of Section IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft EIR. As discussed in the EIR, the proposed Project would not be inconsistent with this plan.

The compatibility of the proposed land uses with existing land uses is discussed in Section IV.A.2, Land Use – Physical Land Use, of the Draft EIR. The analysis as detailed therein concludes that the proposed Project would result in less than significant physical land use impacts.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
### Comment No. 12-55

| 5 | Exhibit 1a | At a time when the City and County are in desperate [sic] need of jobs, we should not be approving the conversion of revenue generating commercial and industrial property into residential zones. |

### Response to Comment No. 12-55

As noted in the Draft EIR’s Project Description, among the Project’s objectives are to: (1) expand entertainment industry and complimentary uses of the Project Site; and (2) maintain and enhance the site’s role in the entertainment industry. (Draft EIR, Section II, Project Description, pages 275–276). More specifically, the proposed Project includes a development strategy which would expand and contribute to the existing on-site motion picture, television production and entertainment facilities while introducing new complementary uses.

Accordingly, the Project includes a net increase of 307,949 square feet of studio facility floor area, resulting in a new total of 1,536,069 square feet, a net increase of 437,326 square feet of studio-related office space, for a new total of 1,379,871 square feet, and a net increase of 495,406 square feet of other supportive office space, for a new total of 958,836 square feet (Draft EIR, Table 2, page 280). Therefore, although under the proposed Project, substantial portions of the Back Lot Area would become the Mixed-Use Residential Area, there would not be a net loss of film and television production and support facilities. Rather, the Project would result in a net increase of 1,240,681 square feet of studio-related floor area, for a new total of 3,874,776 square feet. The Draft EIR estimates that the Project’s net new floor area for film and television production, studio-office and other related office floor area would generate a net increase of 3,415 full-time and part-time jobs related to film and television production. (Draft EIR, Table 186, page 2044, and Draft EIR Appendix P.)

With respect to revenue generation, the commenter is referred to Response to Comment No. 12-38.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
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| **Current community plan and zoning designations for the 5 portions of the project site located within the City are:** (1) the northeast area of the project site along Barham Blvd. is designated limited commercial and very low density residential, with corresponding zoning of C1 and RE20, respectively, and along the residential, with corresponding zoning of Los Angeles River Flood Control Chanel [sic] near Barham Blvd. is designated open space; (2) the northwest area of the project site located along Lankershim Blvd. is designated community commercial with corresponding C2 zoning; (3) the southeast area of the project site along Barham Blvd. and Buddy Holly Drive is designated very low and minimum density residential, with corresponding zoning of RE 20 and RE 40, respectively; (4) the southwestern area of the project site located along the Hollywood Freeway and adjacent to Hotel and office towers is designated regional center, as well as medium and minimum density residential, with a variety of zoning designations including C2, PB, P, RE15 and RE40; (5) a small portion of land along the north boundary in the middle of the project site adjacent to the within the County of Los Angeles, the portion of the project site occupied by studio uses is designated major industrial within the county’s general plan land use policy map, with the balance of the project site within the County designated as major commercial. Corresponding County zoning is M-I½. Accordingly, the back lot portion of the site which is proposed to be annexed to the City of Los Angeles is also currently within the County’s major industrial land use designation and M -1 ½ zoning. (pages 1, 2 and 3 of Attachment B of the City Master Land Use Permit Application) (Exhibit 2)

All of these revisions will serve to significantly increase density and convert revenue generating commercial and industrial property into residential uses. (Exhibit 3)
Los Angeles River flood control channel, is designated open space, with R1 zoning. In addition the southeast corner of the project site is located in the outer corridor of the Mulholland Scenic Parkway Specific Plan.

Response to Comment No. 12-56

The comment accurately describes the existing City and County general plan land use and zone designations for the Project Site. The comment does not address the environmental analysis in the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

With respect to the increase in density, see Response to Comment No. 12-55. With respect to the revenue implications of the Project’s proposed redevelopment of the Back Lot Area for the Mixed-Use Residential Area, please refer to Response to Comment No. 12-38, above.

Comment No. 12-57

<table>
<thead>
<tr>
<th>Section 1.6</th>
<th>RELATIONSHIP TO EXISTING USES:</th>
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<tr>
<td>The Universal City Specific Plan creates a regulatory framework for long-term development of the Specific Plan area. The Specific Plan also recognizes, however, that Existing Uses within the Specific Plan area will continue as the development permitted by this Specific Plan is implemented. Existing Uses include, but are not limited to: Studio Use including Production Activities; Studio Office; entertainment uses including the</td>
<td></td>
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<td>The Specific Plans proposed by this developer are different from those in effect in the surrounding communities. The developer developed these plans to govern their future development. The Universal City Specific Plan has a “master plan” for a future developer that purchases a site to build. It is possible that the sites will be acquired by different developers who then build the condos, apartments, etc. The plan included the open areas, etc. Those developers will be bound by this Specific Plan.</td>
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Theme Park and Universal Studio Tour; and retail uses. Existing Uses shall be permitted to continue, subject to the applicable regulations of this Specific Plan, including any applicable provisions of Section 3.4 of this Specific Plan. Since this is the applicant’s specific plan, the neighborhood has not had the opportunity, as they did in surrounding communities’ specific plans, to have input in its development.

Response to Comment No. 12-57

The comment appears to be directed toward the process for the development of the proposed Universal City Specific Plan. The comment does not address the environmental analysis in the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Please also refer to the Response to Comment No. 12-52, above regarding public comment on the Project, including the proposed specific plans.

Comment No. 12-58

| 9 | Section 1.6 | The Existing Uses and the Existing Use Overlay will allow all existing use to continue until permits are issued. Modification of the existing use is permitted as long as the modification does not increase the floor area. Such modifications are exempt from the Substantial Compliance Analysis requirement. The provisions of this section are overly broad and should be defined in such a way that the developer is not given carte blanche with respect to any future development or modification of the existing use. |
**Response to Comment No. 12-58**

The comment addresses the development or modification of existing uses in the Existing Uses Overlay Zone within the proposed Universal City Specific Plan area. As explained in the proposed City Specific Plan, the purpose of the Existing Uses provisions is to allow Existing Uses that support the motion picture, television media and entertainment uses on the Project Site to continue operation. The Existing Uses are permitted to continue so long as they comply with the applicable conditions and zoning regulations in the proposed City Specific Plan and Appendix No. 1, thereto, which are consistent with the existing conditions applicable to uses in the Existing Use Overlay. Section 3.4.B of the proposed City Specific Plan allows for the replacement or modification of the existing uses without a Substantial Compliance analysis, provided the repair, replacement or modification does not increase the floor area of the existing use. The comment does not address the environmental analysis in the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-59**

<table>
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<th></th>
<th>Section 2.1 Goal A.</th>
<th>To establish eligible uses and/or activities; and to provide a mechanism for implementing the appropriate operational requirements, regulations or other requirements for these uses. The requirements contained herein provide the necessary flexibility to accommodate future development and to achieve compatibility between land uses.</th>
<th>Although we understand the desire for flexibility, the provisions of the Universal City Specific Plan are overly broad, they do not adequately set forth standards to be adhered to by future developers and could result in uses that are not compatible to adjacent neighborhoods.</th>
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**Response to Comment No. 12-59**

The comment expresses the view that the provisions of the proposed Universal City Specific Plan are overly broad and would allow development not compatible with the adjacent neighborhoods. A specific plan is a regulatory land use ordinance. The proposed Universal City Specific Plan contains detailed regulations related to, for example, permitted and prohibited uses, heights, site coverage, massing, setbacks, parks and open space, transportation and parking, grading, signage, protected trees, lighting and sound.
III.D.1  Written Letters

The Draft EIR (Section IV.A.2, Land Use – Physical Land Use, pages 570–590 and IV.D, Visual Qualities, pages 1066–1107) analyzed the potential of the Project to change the existing land use relationships between the Project Site and existing off-site uses or disrupt, divide, or isolate existing neighborhoods, or potentially impact the visual character and views of valued visual resources, and concluded that impacts in these areas would be less than significant due to the following: (1) continuation of existing on- and off-site development patterns; (2) presence of existing and proposed physical separations (i.e., landscaped areas, roadways, Los Angeles River Flood Control Channel, etc.); and (3) regulations in the proposed City and County Specific Plans that are incorporated as project design features. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-60

| 11 | Section 2.1 Goal D | To provide added opportunities to expand this regional center, which is located in proximity to the Universal City Metro Red Line Station and a regional freeway system. | A significant portion of the area which would be governed by the Universal City Specific Plan is currently part of the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan area (the “SOSCCP”). No portion of the proposed Universal City Specific Plan area is currently designated as a regional center in the SOSCCP. The residential portion of the proposed development is on the opposite side of Universal Studios Specific Plan area. That area is not located in proximity to the Universal City Metro Red Line Station. |

Response to Comment No. 12-60

As shown on Figure 25, page 412, in Section IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft EIR and discussed on page 424, an area located within the south and southwest portion of the Project Site currently within the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan area of the City is designated as Regional Center. This area is located across Lankershim Boulevard from the Universal City Metro Red Line Station.

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With regard to the location of the proposed residential uses compared to the Universal City Metro Red Line Station, the provision of the shuttle system, pursuant to Mitigation Measure B-2, is intended to directly link the Project’s residential development to the Universal City Metro Red Line Station. Specifically, the shuttle would travel along the North-South Road with stops at four to five locations and then via Universal Hollywood Drive to the Universal City Metro Red Line Station, with additional stops adjacent to the Theme Park and Universal CityWalk. Additionally, the easterly location of the residential portion of the Project puts the residents closer to the many entertainment-related jobs in the Burbank Media District and in Hollywood.

Comment No. 12-61

| 11 | Section 2.1 Goal D | The DEIR anticipates the elimination of the east/west road adjacent to the LA River. Without this road the stakeholders of the proposed residential area will not have direct access to the Universal City Metro station. Additionally, their only access to the regional freeway system is through the “F” rated intersections of Barham/Cahuenga and Barham/Olive. (Exhibits 4 and 4a)

It is imperative that the east/west road be constructed and that additional mitigation measures are implemented to reduce the impact on these intersections.

Response to Comment No. 12-61

The comment incorrectly states that without the East-West Road, the proposed residential units would not have a connection to the Universal City Metro Red Line Station. As noted in Response to Comment No. 12-50, above, the Project is proposing a new four-lane divided roadway, the North-South Road, through the residential area. Further, the residential units would be connected to the Universal City Metro Red Line Station via the proposed local shuttle system (see Mitigation Measure B-2 in Section IV.B.1, Traffic/
Access – Traffic/Circulation, of the Draft EIR) that would travel along North-South Road/Universal Hollywood Drive to Lankershim Boulevard.

The comment also incorrectly states that the only access for the residential units to the regional freeway system would be via the intersections of Barham Boulevard/Cahuenga Boulevard and Barham Boulevard/Olive Avenue. As noted in Response to Comment No. 12-50, above, the North-South Road would provide the residential development with direct connections to the US 101 freeway. In addition, as noted in Mitigation Measure B-3 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, the Project is proposing a new southbound on-ramp to US 101 from the Universal Studios Boulevard bridge. (It should be noted that no such freeway connection currently exists.) Toward the north end of the Project Site, the residential units would be connected to the SR 134 freeway via the improved contiguous four-lane Forest Lawn Drive (see Mitigation Measure B-7 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR).

The comment also incorrectly states that the Project needs to implement further mitigation measures to reduce its impact on the intersection of Barham Boulevard & Cahuenga Boulevard. As shown in Table 39 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, the Project’s proposed mitigation measures reduce the Project’s impact at this intersection to less than significant. Therefore, the Project does not need to implement further mitigation measures at this location.

With regard to the East-West Road, the road is shown on the County Highway Plan which was adopted in 1980. No funding has been allocated for the East-West Road, and no right-of-way has been dedicated for its construction. As stated on page 416, Section IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft EIR, the County is currently in the process of updating the County General Plan including an update to the County Highway Plan. A draft of the updated County Highway Plan is set forth as Figure 4.4 of the Draft Mobility Element. The Draft County Highway Plan no longer shows the East-West Road or the Forman Avenue Extension (see Figure 1 on page III-9 of this Final EIR). While the Draft County Highway Plan as proposed would delete the East-West Road with the Forman Avenue Extension, the officially adopted County Highway Plan as of this date is the County Highway Plan adopted on November 25, 1980. As such, one of the discretionary actions requested to implement the proposed Project is the deletion of the East-West Road from the County Highway Plan.

As discussed beginning on page 2413 in Section V, Alternatives to the Proposed Project, of the Draft EIR, Project Alternatives 8 and 9 evaluated the environmental impacts of the East-West Road as compared to the Project roadway circulation system. As explained on pages 2416-2418 of the Draft EIR, impacts to area intersections and freeways would be greater under Alternatives 8 and 9 than under the proposed Project. The commenter is also referred to Topical Response No. 10: East-West Road Alternatives (see
Section III.C, Topical Responses of this Final EIR), for further information regarding the East-West Road.

**Comment No. 12-62**

<table>
<thead>
<tr>
<th></th>
<th>Goal F</th>
<th>To recognize the relationship between the Universal City Specific Plan, the Universal Studios Specific Plan, and other uses surrounding the Universal Studios site such as residences, other studios, and other commercial enterprises.</th>
<th>Although this is a stated goal of the Universal City Specific Plan, this proposed specific plan actually ignores the impact of the project on existing residences, and on the scale and character of the surrounding communities.</th>
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**Response to Comment No. 12-62**

The Draft EIR specifically analyzes the potential impacts of the Project on the existing environment, including existing residences in the Project vicinity. Specifically with regard to potential impacts to the scale and character of the existing residences, please see Section IV.A.2, Land Use – Physical Land Use, of the Draft EIR, pages 570–590, and Section IV.D, Visual Qualities, pages 1066–1107 and Response to Comment No. 12-54 regarding impacts on the surrounding community.

**Comment No. 12-63**

<table>
<thead>
<tr>
<th></th>
<th>Goal G</th>
<th>To allow a maximum development within the Specific Plan area of 2,937 new Dwelling Units, 115,000 square feet of new retail Floor Area, 65,000 square feet of new Community Serving Uses Floor Area, 250,000 square feet of new Studio Office Floor Area, 50,000 square feet of new Studio Use Floor Area, and 79,665 square feet of existing Studio Office Floor Area and 30 square feet of existing Studio Use Floor Area, including any additional square</th>
<th>The size of the development to be permitted within the Universal City Specific Plan area is too big. As proposed in the DEIR, all of the traffic from the residential development will end up on Barham pursuant to the Proposed Circulation Plan (Exhibit 19) as traveling east or west on Universal Hollywood Drive will take residents through the Universal Studios Theme Park and exits onto Lankershim across from the Metro Station. This is not a feasible route for commuters, if any are actually</th>
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Response to Comment No. 12-63

The comment incorrectly assumes that all trips from the Mixed-Use Residential Area will travel on Barham Boulevard. As discussed in Section IV.B.1.5.b.(2)(a) of the Draft EIR, the Project is proposing a new public roadway “North-South Road” which would be built within the proposed Mixed-Use Residential Area and travel north/south parallel to Barham Boulevard. The proposed North-South Road would be connected between Lakeside Plaza Drive on the north and Buddy Holly Drive (the US 101 frontage road) on the south, thereby providing a north-south Modified Secondary Highway connection through the Project Site. The comment is incorrect that at the southern end of the Project Site traffic from the North-South Road would travel through the Universal Studios Theme Park and exit on Lankershim Boulevard. As noted above, the North-South Road would also connect with Buddy Holly Drive to the south which would also permit exiting Cahuenga Boulevard (West) via the Universal Studios Boulevard Bridge. See also Response to Comment Nos. 12-50 and 12-61, above.

Comment No. 12-64

| 11 | Goal G | No residential development should be permitted without sufficient infrastructure including the east/west road adjacent to the LA River. |

Response to Comment No. 12-64

Regarding infrastructure, as discussed in the Draft EIR, the Project would provide various utility, stormwater, and roadway infrastructure improvements as project design features or mitigation measures (see, for example, Section IV.B.1, Traffic/Access – Traffic/Circulation, Section IV.G.1.a, Water Resources – Surface Water – Drainage, Section IV.L.1, Utilities – Sewer, and Section IV.L.2, Utilities – Water).
With regard to the East-West Road, the commenter is referred to Response to Comment No. 12-61 above and Topical Response No. 10: East-West Road Alternatives (see Section III.C, Topical Responses, of this Final EIR).

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-65**

| 19 | 3.2 Section 2 Item A | Except as provided herein, no grading permit, foundation permit, building permit, use of land permit, or permit for a change of use shall be issued for any Project in whole or in part within this Specific Plan area unless the Director has issued a Substantial Compliance Analysis determination pursuant to Section 15 of this Specific Plan. | We do not agree with the proposal to replace the Project Permit Compliance provisions of Section 11.5.7.C of the Municipal Code. This will eliminate local community input by enabling applicants to bypass all local area decision makers such as the Area Planning Commission and go directly to the City Planning Commission. (Page 82 Section 15.1 and 15.2) This would prevent important outreach and input from local organizations such as neighborhood councils and resident associations as well as the neighboring stakeholders who would be most affected. We are not aware of this provision being included in any other current specific plan ordinances. |

**Response to Comment No. 12-65**

The comment addresses the process for future development within the proposed Universal City Specific Plan area pursuant to the Substantial Compliance Analysis process described in the proposed Universal City Specific Plan. All members of the public have an opportunity to comment on all aspects of the Project including the proposed specific plans through the public comment period on the Draft EIR, as well as during the public hearings that the City and County will hold prior to making any decision whether to approve the Project. The comment does not address the environmental analysis in the Draft EIR.
Comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-66**

| 19 | 3.2 Section 2 Item C | No Substantial Compliance Analysis shall be approved unless the Project substantially complies with all applicable provisions of this Specific Plan. | We disagree with the concept of substantial compliance as it vest [sic] too much power in the Director and this proposed specific plan contains provisions permitting exceptions to its own provisions with respect to height. (Page 1231 of the DEIR) (Exhibit 20) |

**Response to Comment No. 12-66**

The comment addresses the process for future development within the proposed Universal City Specific Plan area pursuant to the Substantial Compliance Analysis process described in the proposed Universal City Specific Plan. As set forth in Section 15.1.A.1 of the proposed City Specific Plan, the Planning Director shall have the authority to review each Project (as defined in the Specific Plan) for compliance with the applicable requirements of the Specific Plan and if in substantial compliance, to grant a substantial Compliance Analysis determination conditioned on those requirements. If the Project fails to be in substantial compliance with the applicable requirements of the Specific Plan, the Director shall deny the application. The comment does not address the environmental analysis in the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

The referenced exhibit (page 1231 of the Draft EIR), is part of a recommended mitigation measure (Mitigation Measure E.1-4) that would reduce permitted heights in areas within the southeastern portion of the Project Site in order to mitigate a potential shade/shadow impact. The attached exhibit (Exhibit 20 to the comment letter) is a copy of the height zone map from the proposed Universal City Specific Plan. As described on page 296 of the Draft EIR, the proposed Universal City Specific Plan proposes eight Height Zones, and five Height Exception Areas that allow a specific number of buildings (11 buildings across 5 Height Zones) to exceed the Height Zone limit to the maximum specified Height Exception limit. The potential impacts of the proposed Height Zones and Height Exceptions, including, for example, shade/shadow impacts, are analyzed in the Draft EIR (see Section IV.E.1, Light and Glare – Natural Light, of the Draft EIR).
Comment No. 12-67

| 19 | 3.2 Section 2 Item D | The prohibitions specified in this Section shall not apply to any of the following uses and facilities, which shall be exempt from the Substantial Compliance Analysis requirement, as set forth in Section 15 of this Specific Plan. | No uses should be automatically exempt from compliance with the Substantial Compliance Analysis requirement as this requirement in and of itself already represents a significant weakening of the protections of the Municipal Code. (Exhibit 5) |

Response to Comment No. 12-67

The comment objects to the inclusion of exempt uses within the proposed Universal City Specific Plan area. Section 3.2.D of the proposed Universal City Specific Plan provides that the following uses be exempted from the requirement to obtain a Substantial Compliance Analysis review: Sets/Façades, Grading or stockpiling of less than 50,000 cubic yards within the Universal City Specific Plan area when associated with Production Activities, Production Activities, Temporary Uses, Construction Trailers, and Existing Uses. The comment does not address the environmental analysis in the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-68

| 19 | 3.2 Section 2 Item E | Prohibited Uses and Facilities | We agree with the prohibited uses listed. However, the following uses should also be prohibited. Small lot subdivisions, factory built homes, bed and breakfast facilities, modular office trailers, and maintenance facility/storage facilities. Additionally, Item 84 of Section 3.8 should be eliminated as it vests too much power in the Director and thwarts community input and involvement. |
**Response to Comment No. 12-68**

The comment expresses support for the uses proposed to be prohibited within the proposed Universal City Specific Plan area and recommends other uses also be prohibited. The permitted uses in the proposed City Specific Plan are consistent with the mixed-use nature of the proposed Project. The comment also addresses the proposed City Specific Plan provision that provides the Director of Planning authority to allow certain other uses within the proposed Universal City Specific Plan area. The proposed provision would allow flexibility to permit uses in the Mixed-Use Universal City District that are not enumerated, however, the uses would have to be similar to the enumerated uses. The comment does not address the environmental analysis in the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-69**

| 20 | 3.3 Section B. Table 1 | Maximum Permitted Floor Area by Land Use Category | For all categories the maximum permitted development is excessive and should be reduced significantly. There should be no residential development in this area as the area should continue to be zoned as manufacturing and commercial as that is the type of development that will bring permanent jobs to the area. By allowing residential development the City would be required to provide services and infrastructure that it is not able to provide to existing neighborhoods now. |

**Response to Comment No. 12-69**

The comment expresses concerns with the proposed amount and type of development within the proposed Universal City Specific Plan area and recommends no residential development. The comment also addresses the City’s ability to provide services and infrastructure for the Project. The Draft EIR analyzed the Project’s potential impact on City public services (Fire, Police, Parks, and Libraries) and utility (Water, Sewer, and Electricity) infrastructure. See Section K.1, Public Services – Fire Protection (pages 1694–
III.D.1 Written Letters

1721); Section K.2, Public Services – Police/Sheriff (pages 1729–1749); Section K.4, Public Services – Parks and Recreation (pages 1788–1806); Section K.5, Public Services – Libraries (pages 1818–1831); Section L.1, Utilities – Sewer (pages 1840–1852); Section L.2, Utilities – Water (pages 1868–1883), and Section L.4, Utilities – Electricity (pages 1931-1950). The Draft EIR concluded that with the incorporation of the described project design features and recommended mitigation measures the Project’s impacts would be less than significant with regard to these City services and City-provided utilities. Section IV.L.3, Utilities – Solid Waste (pages 1906–1925), of the Draft EIR also analyzed solid waste and concluded that the Project’s potential impacts related to construction solid waste would be less than significant with the incorporation of the project design features. However, due to the uncertainty of future capacity of landfills outside of the City (the City does not have operating landfills within the City), the Draft EIR conservatively assumes that the Project’s impacts related to solid waste during operations would remain significant and unavoidable after incorporation of the project design features.

With respect to the creation of jobs, the commenter is referred to Response to Comment No. 12-55, above.

**Comment No. 12-70**

| 20 | 3.3 | Section B. Table 1 | Additionally, the open space area is subject to a change in use (page 27 of 85) and even allows for a height exception in the open space area. Why would there ever be a need for a height exception in the open space areas. (Environmental Assessment Form –II. Project Description Page II-10) (Exhibits 6a, 6b and 6c) |

**Response to Comment No. 12-70**

The comment appears to address the regulations for Open Space District No. 3 in the proposed Universal City Specific Plan area. Section 3.7.B.17 of the proposed Universal City Specific Plan allows the Director of City Planning to determine uses that are similar to the uses listed in Section 3.7.B. Section 3.7.E.3 of the proposed Universal City Specific Plan expressly prohibits Height Exceptions in Open Space District No. 3. This prohibition is also noted on Figures 38 and 41 of the proposed Universal City Specific Plan referenced as Exhibits 6b and 6c to the comment. In addition, Figure 173 of Section
IV.E.1, Light and Glare – Natural Light, of the Draft EIR referenced as Exhibit 6a to the comment does not correspond with an Open Space District; rather it is part of a recommended mitigation measure (Mitigation Measure E.1-4) that would reduce permitted heights in areas within the southeastern portion of the Project Site in order to mitigate a potential shade/shadow impact. The comment does not address the environmental analysis in the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-71**

| 20 | 3.3 Section B. Table 1 | Table does not reflect additional square feet of retail or hotel Floor Area as may be permitted pursuant to Equivalency Transfers as set forth in Subsection 3.11 of this Specific Plan. | The Equivalency Program permits the development of a 500 room hotel in an area that already has two major hotels within the boundaries of the project site and several other hotels in the immediately surrounding area. |

**Response to Comment No. 12-71**

The comment is incorrect that the proposed Land Use Equivalency Transfers would permit the development of a 500-room hotel. A 500-room hotel is proposed to be located within the boundaries of the County Universal Studios Specific Plan area. The comment incorrectly states that the two major hotels, Hilton and Sheraton, are located within the Project Site; they are not located within the boundaries of the Project Site. They are located adjacent to the Project Site. Section 3.11 of the proposed Universal City Specific Plan would allow for additional retail of up to 50,000 square feet or a hotel of up to 200 rooms and 200,000 square feet with a specified reduction in dwelling units. The comment notes that there are other hotels in the area, but does not address the environmental analysis in the Draft EIR. See also Response to Comment No. 12-42. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-72**

| 23 | 3.4 Section | The Existing Uses within the Existing Use Overlay may continue within each of the applicable Planning Subareas until a building permit for a | We agree that existing uses should be allowed to continue. Although we do not agree that there should be any residential development as part of this project, if residential |
III.D.1  Written Letters

When a building permit for a residential building is issued for a Planning Subarea, Existing Uses in adjacent Planning Subareas within the Existing Use Overlay shall be permitted to continue until building permits for residential buildings are issued in those Planning Subareas. Development is begun then existing uses in adjacent areas should be allowed only if there is a significant separation and noise barriers between the existing uses and the residential areas as well as the open space areas.

Response to Comment No. 12-72

The comment supports the continuation of existing uses and recommends that if residential uses are allowed, then separation and noise barriers should occur between the existing uses and residential uses. As the comment notes, Section 3.4.C.1 of the proposed Universal City Specific Plan provides that the Existing Uses within the Existing Use Overlay may continue within each of the applicable Planning Subareas until a building permit for a residential building is issued within that Planning Subarea. Because the Existing Uses must be discontinued within an overall Planning Subarea once a residential building permit is issued, this will provide a separation between the Existing Uses and the new residential uses. The comment does not address the environmental analysis in the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-73

Response to Comment No. 12-73

The comment appears to object to the proposed Universal City Specific Plan provision that provides the Director of Planning discretion to permit uses similar to the listed permitted uses in Open Space District No. 1. Section 3.5.B.8 of the proposed City Specific Plan would allow flexibility to permit uses in Open Space District 1 that are not enumerated, however, the uses would have to be similar to the enumerated uses. The comment does
not address the environmental analysis in the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-74**

| 24 | 3.5 Section K | Open Space District 1 | Although signs are limited in Open Space Districts 1 and 2 to information, temporary signs, and public facility signs, the signage proposed for the adjacent sign districts is so broad that there could be significant lighting intrusion and blight from those districts into the open space areas. We do not agree with the creation of the proposed sign districts. (Exhibit 7) |

**Response to Comment No. 12-74**

The comment suggests that the signage proposed for the sign districts adjacent to Open Space District Nos. 1 and 2 may have significant lighting intrusion into the open space areas. CEQA requires preparation of an EIR on any project that may have a significant effect on the environment. (Pub. Resources Code § 21151(a).) A project’s proposed uses fall outside the scope of the existing environment and baseline conditions against which an agency determines the project’s impacts and outside of the EIR’s scope of analysis. (CEQA Guidelines §15126.2(a). “In assessing the impact of a proposed project on the environment, the lead agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the notice of preparation is published....” (emphasis added).)

Further, the sign districts adjacent to Open Space District Nos. 1 and 2 are Sign District 1A (Universal Mixed-Use Sign District) and Sign District 1B (Universal City Town Center Sign District). In both sign districts, Animated and Electronic Message Signs are prohibited, and, thus, any lighting spill-over from adjacent sign districts into Open Space District Nos. 1 and 2 would be minimal. As noted on page 129 of Appendix G of the Draft EIR, “[b]ased on field observations, other [non-illuminated] sign types are not anticipated to have a lighting impact.”
The comment includes a reference to Exhibit No. 2 of the proposed Universal City Specific Plan (noted as Exhibit 7 to the comment letter), which illustrates the Land Use districts within the proposed Universal City Specific Plan, but not the proposed sign districts, which are illustrated on Exhibit No. 7 of the proposed Universal City Specific Plan. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-75**

| 25 | 3.6 Section B Item 6,7, 8,9 and 10 | Open Space District 2 | Uses permitted under items 6 through 9 are not compatible with an open space area and should not be permitted. |

**Response to Comment No. 12-75**

The comment objects to the following permitted uses within Open Space District No. 2: Substation/Utility Infrastructure; Public Services Facility of up to 20,000 square feet; up to 3 Cellular Facilities; up to 5,000 square feet of maintenance storage; and Infrastructure, including, but not limited to, water and sewer facilities, water reservoirs, and other public and private infrastructure to support the development within the Specific Plan area. As explained in Section 3.6 of the proposed City Specific Plan and discussed on pages 309-313 of the Draft EIR, the purpose of Open Space District No. 2 is to allow for limited development and recreational uses that are compatible with the adjacent Existing Off-site Residential Uses. Open Space District No. 2 is located adjacent to Barham Boulevard and the US 101 freeway and Cahuenga Boulevard. It is also located proximate to off-site utility infrastructure. Given its location, it is an appropriate location on the Project Site for potential utility and public service facilities. The comment does not address the environmental analysis in the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-76**

| 25 | 3.6 Section B Item 11 | Open Space District 2 | Item 11, Director’s discretion - should be eliminated. |
Response to Comment No. 12-76

The comment appears to object to the proposed City Specific Plan provision that provides the Director of Planning discretion to permit uses similar to the listed permitted uses in Open Space District No. 2. Section 3.6.B.11 of the proposed City Specific Plan would allow flexibility to permit uses in Open Space District 2 that are not enumerated, however, the uses would have to be similar to the enumerated uses. The comment does not address the environmental analysis in the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-77

| 25 | 3.6 Section C Item 11 | Open Space District 2 | The construction of 5,000 square feet of floor area is not consistent with open space and should not be permitted. |

Response to Comment No. 12-77

The comment objects to the construction of up to 5,000 square feet of floor area within Open Space District No. 2. The comment does not address the environmental analysis in the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. See also Response to Comment No. 12-75 above.

Comment No. 12-78

| 25 | 3.6 Section F | Open Space District 2 – No automobile parking required | Some designated parking should be provided adjacent to this open space area otherwise adjacent residential and commercial areas will be burdened by the cars parked by users of the open space. |

Response to Comment No. 12-78

The comment suggests that parking should be provided adjacent to Open Space District No. 2. As explained in Section IV.B.2, Traffic/Access – Parking, of the Draft EIR,
with the exception of restaurants and fitness facilities, the proposed City Specific Plan requirements provide for equal or more parking than that required by the Los Angeles Municipal Code for the specified uses. Based upon the parking demand analyses discussed on pages 953-954 of the Draft EIR, the Project would provide sufficient parking to meet the demand requirements of the proposed Specific Plan and Project impacts related to parking under the proposed City Specific Plan would be less than significant. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-79**

| 26  | 3.6 Section G | Open Space District 2 | These uses should not be permitted in the open space district. Service facility and utility infrastructure structures that are 55 feet high are not compatible with open space. |

**Response to Comment No. 12-79**

The comment objects to certain uses being allowed within Open Space District No. 2. The comment is similar to Comment Nos. 12-51 and 12-75 above. Please see Response to Comment Nos. 12-51 and 12-75 , above.

**Comment No. 12-80**

| 26  | 3.6 Section J | Open Space District 2 | Removal of protected trees should not be allowed. |

**Response to Comment No. 12-80**

The comment appears to object to the removal of protected trees in Open Space District No. 2. The proposed Universal City Specific Plan includes Protected Tree Regulations (Section 11) that regulate the removal of Protected Trees within the City portions of the Project Site. Consistent with current City Code, Protected Trees are defined as oak trees indigenous to California (other than Scrub Oak), Southern California Black Walnut, California Sycamore, and California Bay Laurel, which measure four inches or more in cumulative diameter, four and one half feet above the ground level at the base of the tree. Pursuant to the regulations, removal of a Protected Tree may be requested by
filing a Substantial Compliance Analysis application. The regulations further require that the Applicant calculate the amount of Protected Tree canopy area being removed and provide an equivalent amount of replacement canopy area on-site or off-site or pay an in lieu fee for each removed Protected Tree. The potential impacts of the Project’s removal of Protected Trees were analyzed in detail in Section IV.I, Biota, of the Draft EIR. As discussed on pages 1585–1586 of the Draft EIR, with implementation of the Protected Tree regulations in the proposed City Specific Plan and Mitigation Measure I-4, which includes tree protection and enhancement measures from pre- to post-construction, potential impacts would be reduced to a level that is less than significant. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-81**

| 26 | 3.5 Section K | Open Space District 2 | Although signs are limited in Open Space Districts 1 and 2 to information, temporary signs, and public facility signs, the signage proposed for the adjacent sign districts is so broad that there could be significant lighting intrusion and blight from those districts into the open space areas. We do not agree with the creation of the proposed sign districts. |

**Response to Comment No. 12-81**

This comment is the same as Comment No. 12-74, above. The commenter is referred to Response to Comment No. 12-74.

**Comment No. 12-82**

| 26 | 3.7 Section B Items 2, 4, 6, 7, 8, 9, 10, 11 and 16 | Open Space District 3 | This open space area is a long narrow area where there does not appear to be sufficient space to accommodate these uses. Further, residential uses to the south would be subjected to light intrusion. |
Response to Comment No. 12-82

The comment questions whether there is sufficient space to accommodate park and recreational facilities, playground facilities, interpretive/educational facilities, Cellular Facilities, Communication Facilities, maintenance storage, restaurant and outdoor dining facilities or Community Serving Uses within Open Space District No. 3. As discussed on pages 309-313, in Section II, Project Description, of the Draft EIR, Open Space District No. 3 is approximately 6 acres in size and occurs at three locations; one along the Los Angeles River Flood Control Channel, and two mid-site between the Mixed-Use Universal City District to the east and the Studio Area to the west. The purpose of Open Space District No. 3 is to promote a wide range of recreational activities and amenities for the residents and guests of the Mixed-Use Residential Area.

The comment also suggests that residential uses to the south of Open Space District No. 3 would be subjected to light intrusion. As discussed in Section IV.E.2, Light and Glare – Artificial Light, of the Draft EIR, new light sources within the proposed City Specific Plan Area (including Open Space District No. 3) shall be subject to the lighting regulations of Section 12 of the proposed City Specific Plan. Further, as discussed in Response to Comment No. 12-74, above, animated and electronic message signs are prohibited in Sign District 1A (Universal Mixed-Use Sign District), which encompasses Open Space District No. 3. As discussed in Section IV.E.2, Light and Glare – Artificial Light, of the Draft EIR and Appendix G, Lighting Technical Report, a technical study was performed to model both the impacts from Project lighting, as well as illuminated signage. Based on this modeled analysis, which included receptor areas to the south of the Project Site, operational and signage lighting impacts were found to be less than significant, given the regulations in the proposed Specific Plans, the existing light environment, and the distance to certain off-site receptors. (Draft EIR, pages 1277–1278.)

Regarding the analysis of the Project on proposed uses, the commenter is referred to Response to Comment No. 12-74.

Comment No. 12-83

| 27 | 3.7 Section B Items 2, 12, 13, 14, and 15 | Open Space District 3 | This open space area is a long narrow area where there does not appear to be sufficient space to accommodate these uses. These uses should be significantly restricted as to the number and type permitted each year. i.e. [sic] a maximum of one or two outdoor festivals per year. Additionally, no |
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parking is provided.

Some designated parking should be provided adjacent to this open space area otherwise adjacent residential and commercial areas will be burdened by the cars parked by users of the open space.

Response to Comment No. 12-83

With regard to the size and configuration of Open Space District No. 3, refer to Response to Comment No. 12-82. The comment also recommends limiting the number and types of events within Open Space District No. 3. The proposed City Specific Plan does include limitations on the frequency of outdoor concerts and outdoor movies in Open Space District No. 3 (see Section 3.7.B.12 and 13 of the proposed City Specific Plan). The comment also suggests that parking should be provided adjacent to Open Space District No. 3. As explained in Section IV.B.2, Traffic/Access – Parking, of the Draft EIR, with the exception of restaurants and fitness facilities, the proposed City Specific Plan requirements provide for equal or more parking than that required by the Los Angeles Municipal Code for the specified uses. Based upon the parking demand analyses discussed on pages 953-954 of the Draft EIR, the Project would provide sufficient parking to meet the demand requirements of the proposed Specific Plan and Project impacts related to parking under the proposed City Specific Plan would be less than significant. The comment does not address the environmental analysis in the Draft EIR. The comment is noted and has been incorporated into the Draft EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-84

| 27 | 3.7 Section E Items 1 and 2 | Open Space District 3 - The Height Zones range between 625 feet above MSL to 825 feet above MSL. | Structures that are 625 to 825 feet high are not compatible with open space and should not be allowed. |
Response to Comment No. 12-84

The comment addresses the heights proposed in Open Space District No. 3. The comment appears to mistakenly interpret the proposed Universal City Specific Plan as allowing buildings between 625 feet to 825 feet in height. However, as Figure 16 in the Draft EIR and Exhibit No. 5 of the proposed Universal City Specific Plan illustrate, the height zones proposed would limit building heights to between 625 feet above mean sea level (msl) to 825 feet above msl within Open Space District No. 3. The mean sea level height limit would allow buildings of up to 200 feet in height depending upon the applicable height zone and future grade elevation. (See Table 4 on page 298 of the Draft EIR). However, given the proposed permitted uses in Open Space District No. 3, it is anticipated that any structures developed in Open Space District No. 3 would be limited to low rise structures.

Section IV.D, Visual Qualities, of the Draft EIR (pages 1066–1107) analyzed the potential impact of the Project with the building heights described in Table 4 to the visual character and views of valued visual resources of the surrounding communities and concluded that impacts would be less than significant as the Project would not result in substantial adverse changes with regard to contrast, prominence, and coverage from the vantage points analyzed.

Comment No. 12-85

<table>
<thead>
<tr>
<th>27</th>
<th>3.7</th>
<th>Open Space District 3 -Protected Trees</th>
<th>Removal of protected trees should not be allowed or should be severely restricted.</th>
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Response to Comment No. 12-85

This comment is similar to Comment No. 12-80, above. The commenter is referred to Response to Comment No. 12-80 above.

Comment No. 12-86

<table>
<thead>
<tr>
<th>27</th>
<th>3.7</th>
<th>Open Space District 3 -Signage</th>
<th>There does not appear to be any limitations on the type of signs permissible in Open Space District 3 similar to those in Open Space Districts 1 and 2. Additionally, the signage permitted in the adjacent sign districts is so broad that there</th>
</tr>
</thead>
</table>

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could be significant lighting intrusion and blight from those districts into the open space areas. We do not agree with the creation of the proposed sign districts.

Response to Comment No. 12-86

The issues raised in this comment are similar to the issues raised in Comment Nos. 12-74 and 12-82, above. Please refer to Response to Comment Nos. 12-74 and 12-82, above.

Comment No. 12-87

<table>
<thead>
<tr>
<th>28, 29 and 30</th>
<th>3.8 Section B Items 3, 9, 17, 20, 25, 43, 51, 55 and 61</th>
<th>Mixed Use Universal City District Permitted Facilities and Uses</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>The facilities and uses listed in Items 9, 17, 20, 25, 43, 51, 55 and 61 should not be permitted as part of this specific plan.</td>
</tr>
</tbody>
</table>

Response to Comment No. 12-87

The comment objects to certain uses (factory-built homes, bed and breakfast facility, cellular facilities, communications facilities, hotel, maintenance facility/storage facility, modular office trailer, and outdoor/sidewalk sales of retail merchandise) permitted within the Mixed-Use Universal City District under the proposed Universal City Specific Plan. The permitted uses in the proposed City Specific Plan are consistent with the mixed-use nature of the proposed Project. The comment does not address the environmental analysis in the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-88

<table>
<thead>
<tr>
<th>31</th>
<th>3.8 Section B Item 80</th>
<th>Mixed Use Universal City District- Temporary Uses</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>This item is overly broad and should be eliminated. Any temporary uses should be narrowly</td>
</tr>
</tbody>
</table>
Response to Comment No. 12-88

The comment objects to temporary uses being permitted within the Mixed-Use Universal City District under the proposed Universal City Specific Plan. Pursuant to the proposed City Specific Plan, temporary uses may not be prohibited uses under the Specific Plan and may not exceed 180 days within a twelve-month period. The comment does not address the environmental analysis in the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-89

| 31 | 3.8 Section B Item 84 | Mixed, Use Universal City District | Item 84, Director’s discretion - should be eliminated. |

Response to Comment No. 12-89

The comment appears to object to the proposed Universal City Specific Plan provision that provides the Director of Planning discretion to permit uses similar to the listed permitted uses in the Mixed-Use Universal City District. This issue was raised in Comment No. 12-68 above. The commenter is referred to Response to Comment No. 12-68, above. The comment does not address the environmental analysis in the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-90

| 31 | 3.8 Section E Item 84 | Mixed Use Universal City District- Height | The maximum height listed in Exhibit No. 5 for every planning sub area is too high. All heights should be significantly reduced to conform to the scale and character of the surrounding area. Views are protected by the Sherman Oaks – Studio City – Toluca Lake – Cahuenga Pass Community Plan. |
| Allow these heights will obliterate the protected views of the current residents of the community plan area see objective 1.3. (Appendix K2) |

**Response to Comment No. 12-90**

The comment objects to the heights proposed in all Planning Subareas within the proposed Universal City Specific Plan area. Figure 16 in the Draft EIR and Exhibit No. 5 of the proposed Universal City Specific Plan illustrate the proposed height zones for each Planning Subarea within the Universal City Specific Plan area described in terms of maximum heights above mean sea level (msl). The corresponding approximate building heights are summarized in Table 4 on page 298 of Section II, Project Description, the Draft EIR. The proposed Height Zones and Height Exceptions were designed to limit view impacts to the adjacent neighborhoods. For example, in the Mixed-Use Residential Area only 11 buildings are permitted to use the Height Exceptions, and any portion of a building using a Height Exception shall be limited to an individual floor plate of 20,000 square feet and have a minimum separation of 150 feet from any portion of another building utilizing a Height Exception. (See proposed City Specific Plan Sections 4.1.B.3 and 4.1.B.4.)

Section IV.D, Visual Qualities, of the Draft EIR (pages 1066–1107) analyzed the potential impacts of the proposed maximum building heights relative to the visual character and views of valued visual resources and concluded that impacts would be less than significant because the Project would not result in substantial adverse changes with regard to contrast, prominence, and coverage from the vantage points analyzed. In addition, Section IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft EIR (pages 507–508) concluded that while the proposed Project would not further the Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass Community Plan objective to limit intensity and density of land uses in hillside areas, it would support policies to incorporate design elements that achieve compatibility with off-site uses such as Open Space Districts, building Height Zones, building setbacks, lighting restrictions, and landscaped buffers areas and in so doing would protect the character and scale of existing neighborhoods and preserve existing views in hillside areas referenced as Appendix K2 to the comment. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
### Comment No. 12-91

| 31 | 3.8 Section H | Mixed Use Universal City District- Protected Trees | Removal of protected trees should not be allowed or should be severely restricted. |

**Response to Comment No. 12-91**

This comment is similar to Comment Nos. 12-80 and 12-85, above. The commenter is referred to Response to Comment No. 12-80 and 12-85 above.

### Comment No. 12-92

| 31 | 3.8 Section I | Mixed Use Universal City District- Signage | The signage permitted in the adjacent sign districts is so broad that be significant lighting intrusion and blight from those districts into the open space areas. We do not agree with the creation of the proposed sign districts. |

**Response to Comment No. 12-92**

The issues raised in this comment have been raised earlier in Comment Nos. 12-74, 12-81, and 12-86. The commenter is referred to Response to Comment Nos. 12-74, 12-81, and 12-86, above.

### Comment No. 12-93

| 32 | 3.9 Section B Items 2, 8, 11, 12 | Technical Support Overlay Subdistrict- Permitted Facilities and Uses | This area borders the Los Angeles River and the provisions of this proposed specific plan must be in complete compliance with the provisions of the LA RIO Master Plan. Storage of Entertainment Attractions, displays and equipment would not be in keeping with the provisions or intent of the LA RIO Master Plan. Additionally, |
it could result in significant blight at a main entry point to the proposed specific plan area.

Response to Comment No. 12-93

The Technical Support Overlay Subdistrict is located off Lakeside Plaza Drive and includes the area of the existing Lakeside Plaza office building and satellite dishes. As stated in the proposed City Specific Plan, the purpose of the Technical Support Overlay Subdistrict is to allow for uses that support the media and entertainment uses occurring in the Universal Studios Specific Plan area while also allowing neighborhood serving uses. The comment refers to the “LA RIO Master Plan.” As described in the Draft EIR, the Los Angeles River Revitalization Master Plan is a vision document providing an overall vision for the revitalization of the Los Angeles River Flood Control Channel. As explained in more detail in the Draft EIR, the Project furthers the goals and objectives of, and would not be inconsistent with, the City River Revitalization Master Plan (see pages 523–524 in Section IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft EIR). The proposed River Improvement Overlay (“RIO”) district is a proposed special use district that would implement the Los Angeles River Revitalization Master Plan, establishing guidelines for both private property and public rights-of-way (see page 431 of Section IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft EIR). The current draft of the proposed RIO, released in February 2012, would require the screening of loading areas, off-street parking facilities, mechanical equipment and utility infrastructure, and exterior trash enclosures and the use of indigenous native trees, plants, and shrubs. The proposed City Specific Plan requires the screening of all rooftop equipment (with the exception of Communications Facilities) and all outdoor storage areas (with the exception of Sets/Facades and Production Activities) from the view of pedestrian public locations within 500 feet of the combined boundaries of the City and County Specific Plans. (See Sections 4.1.B.5 and 4.1.B.6 of the proposed City Specific Plan, attached as Appendix A-1 to the Draft EIR). In addition, the proposed Universal City Design Guidelines provide that loading facilities (and outdoor refuse storage and dumpsters) should be visually screened and secured. (See Guideline SE13 in Appendix 2 to the proposed City Specific Plan). The proposed Universal City Design Guidelines also provide that drought-tolerant plants, including natives, should be used in the Mixed-Use Universal City District where possible (See Guideline L2 in the proposed Universal City Design Guidelines). Among other things, the proposed RIO would also require the provision of pedestrian access to the River. Under the proposed Project, the River Trailhead Park would be developed along the Los Angeles River Flood Control Channel in this City area and would provide access to the River. The comment is noted
and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-94**

| 32 | 3.9 Section B Item 13 | Technical Support Overlay Subdistrict - Permitted Facilities and Uses | Item 13, Director’s discretion - should be eliminated. |

**Response to Comment No. 12-94**

The comment appears to address the Director of Planning’s discretion to determine similar uses to the uses permitted in the Technical Support Overlay Subdistrict. Section 3.9.B.13 of the proposed City Specific Plan would allow flexibility to permit uses in the Technical Support Overlay Subdistrict that are not enumerated, however, the uses would have to be similar to the enumerated uses. The comment does not address the environmental analysis in the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-95**

| 32 | 3.9 Section C | Technical Support Overlay Subdistrict - Height | The maximum height of 625 feet is too high. This height should be significantly reduced to conform to the scale and character of the surrounding area. Views are protected by the Sherman Oaks-Studio City-Toluca Lake – Cahuenga Pass Community Plan. Allowing these heights will obliterate the protected views of the current residents of the community plan area see objective 1.3. (Appendix K2) |
Response to Comment No. 12-95

As stated in Response to Comment No. 12-93 above, the existing Lakeside Plaza office building is located in the Technical Support Overlay Subdistrict. The existing building is approximately 588 feet above mean sea level.

As discussed in Response to Comment Nos. 12-17, 12-25, and 12-84, above, the comment appears to mistakenly interpret the proposed Universal City Specific Plan as allowing buildings up to 850 feet in height. However, as Figure 16 in the Draft EIR and Exhibit No. 5 of the proposed Universal City Specific Plan illustrate, the height zones proposed would limit building heights to between 625 feet above mean sea level to 900 feet above mean sea level within the proposed Universal City Specific Plan area. The mean sea level height limit would allow buildings of up to 200 feet in height in the proposed Mixed-Use Residential Area depending upon the applicable height zone and future grade elevation. The corresponding approximate building heights are summarized in Table 4 in Section II, Project Description, of the Draft EIR on page 298.

Comment No. 12-96

<table>
<thead>
<tr>
<th>Section</th>
<th>3.10</th>
</tr>
</thead>
<tbody>
<tr>
<td>Studio Production District - Permitted Facilities and Uses</td>
<td>Much of this district boarders [sic] US Highway 101 and could be visible from there. These uses could result in blight. None of these uses should be permitted unless specific beautification measures are employed to ensure that they do not result in blight. Such measures should include requirements for the planting of trees and providing screening from view, through the use of other types of soft scape.</td>
</tr>
</tbody>
</table>

Response to Comment No. 12-96

The comment addresses the proposed allowable uses in the Studio Production District. The Studio Production District consists of Planning Subareas 10 and 11 as shown in Exhibit No. 5 to the proposed Universal City Specific Plan and Figure 18 of the Draft EIR. These Planning Subareas are located in the southwestern area of the Project Site within the Business and Entertainment Areas as set forth in Section 3.10 of the proposed City
Specific Plan, the purpose of the Studio Production District is to allow for uses that support the motion picture, television, media, and entertainment uses occurring within the Universal Studios Specific Plan. The total Floor Area of all Studio office buildings and structures permitted in Planning Subarea 10 shall not exceed 250,000 square feet and the total floor area of all Studio Use buildings and structures in Planning Subarea 11 shall not exceed 50,000 square feet. The maximum site coverage for these Planning Subareas shall not exceed 55 percent.

Within Planning Subarea 11, the area south of Buddy Holly Drive and adjacent to the freeway is currently landscaped. It is anticipated that with the Project this area would continue to be landscaped. Further, Section 4.1.B.6 of the proposed Universal City Specific Plan requires screening of all outdoor storage areas from the view of pedestrian public locations within 500 feet of the combined boundaries of the proposed Universal City Specific Plan and the proposed Universal Studios Specific Plan. Non-vegetative screening shall be comprised of materials complementary to nearby buildings. Chain link fence shall only be used as screening in conjunction with the use of slats, mesh, fabric or vegetation. Screening may include landscaping, walls or fences to visually buffer outdoor storage areas.

As discussed in the proposed County Specific Plan, along the freeway edge as shown on page 50 of the proposed County Specific Plan, landscaping will be established to create visual definition to screen views of certain parking structures and outdoor storage areas. Landscaping may consist of dense masses of tall-growing evergreen trees, trellis structures or frames, or other landscape treatments. (See page 50 of the proposed County Specific Plan, attached as Appendix A-2 to the Draft EIR).

It should also be noted that due to existing topography in the area, the 101 Freeway is situated below and depressed along the Project’s property frontage. Accordingly, many of the uses located near the 101 Freeway would not be visible to motorists on the freeway.

The Draft EIR (Section IV.D, Visual Qualities, pages 1066–1107) analyzed the potential impacts of the Project and concluded that impacts with regard to visual character and views would be less than significant as the Project would not result in substantial adverse changes with regard to contrast, prominence, and coverage from the vantage points analyzed. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-97

| 33 | 3.10 Section B Items 14, Studio Production District - Permitted Facilities and Uses | Most of this is a long narrow area which does not appear to be designed to accommodate these |
15, and 16 uses. These uses should be significantly restricted as to the number and type permitted each year. i.e. [sic] a maximum of one or two outdoor festivals per year. The use of the area for outdoor special lighting effects will result in a distraction hazard for motorists on Highway 101.

Response to Comment No. 12-97

The comment addresses the proposed uses (Premieres, Civic Events, and Outdoor Special Lighting Effects) for the Studio Production District. As explained in Response to Comment No. 12-96 above, the Studio Production District consists of Planning Subareas 10 and 11, as shown on Figures 10 and 18 of the Draft EIR (Section II, Project Description pages 281 and 310), which corresponds with Exhibits No. 3 and No. 5 of the proposed Universal City Specific Plan. Planning Subarea 10 is 3.7 acres located at the intersection of Lankershim Boulevard and Universal Hollywood Drive, one of two main public entrances to Universal Studios separated from the freeway by the 10 Universal City Plaza building, a landscaped area, and Buddy Holly Drive. Planning Subarea 11 is 8.6 acres located along the southern edge of the Project Site, adjacent to existing off-site hotels. A portion of Planning Subarea 11 is landscape area along Buddy Holly Drive. Planning Subareas 10 and 11 are within the Business and Entertainment Areas of the Project Site. Premieres, Civic Event and Outdoor Special Lighting Effects are existing uses within the Studio and Entertainment Areas, and it is anticipated that such uses would continue similar to their existing occurrence. With regard to impacts to motorists, the California Vehicle Code restricts lighting that impairs the vision of drivers upon the highway. (See California Vehicle Code Section 21466.5). See also Topical Response No. 9: Signage and Traffic Safety (see Section III.C, Topical Responses, of this Final EIR).

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-98

| 33 | 3.10 Section B Items 17 | Studio Production District - Permitted Facilities and Uses - Signage | We do not agree with the creation of the sign districts as part of this specific plan. The only signage that should be permitted in area 2A |
and AB [sic] should be those that are in compliance with the 2002 Los Angeles City Sign Ordinance. For safety reasons and for protections of views no signs should be allowed on roofs. No offsite signage, supergraphics or animated signs should be allowed at all.

Response to Comment No. 12-98

The comment objects to the creation of sign districts or allowing any signage in proposed Sign Districts 2A and 2B other than as permitted by the 2002 City signage ordinance. Proposed Sign District 2A (Studio Administration Sign District) coincides with Planning Subarea 10 and proposed Sign District 2B (Studio Technical Lot Sign District) coincides with Planning Subarea 11. The comment also objects to roof signs, off-site signage, supergraphics, or animated signs. The Draft EIR (Section IV.A.2, Land Use – Physical Land Use, pages 552–591; Section IV.D, Visual Qualities, pages 1066–1107; and Section IV.E.2, Light and Glare – Artificial Light, pages 1248–1277) analyzed the potential impacts of the Project’s proposed signage and signage lighting. The Draft EIR concluded that with the following: (1) continuation of existing on- and off-site development patterns; (2) presence of existing and proposed physical separations (i.e., landscaped areas, roadways, Los Angeles River Flood Control Channel, etc.); and (3) regulations in the proposed City and County Specific Plans as project design features, the Project including signage would result in less than significant impacts relative to physical land use impacts. Impacts with regard to visual character and views would be less than significant as the Project would not result in substantial adverse changes with regard to contrast, prominence, and coverage from the vantage points analyzed. With regard to signage lighting, a computer simulation model was used to analyze potential light exposure impacts from proposed signage. (See Section IV.E.2, Light and Glare – Artificial Light, of the Draft EIR, page 1269). The modeling analysis confirmed that with implementation of the signage regulations in the proposed City and County Specific Plans, proposed signage would not result in significant impacts at any of the modeled viewpoints. (See page 1273 of the Draft EIR). The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

With regard to traffic safety as concluded in Topical Response No. 9: Signage and Traffic Safety (see Section III.C, Topical Responses, of this Final EIR), the proposed
Specific Plans’ signage regulations, which would allow Electronic Message Signs and Supergraphic signs in some areas, would not pose a significant traffic safety impact to freeway or street drivers given the proposed Specific Plans’ limitations, the Project Site’s relationship to adjacent streets and freeways, and the unique characteristics of motorists entering the Project Site and traveling on adjacent public street corridors. In addition, see Topical Response No. 9, Signage and Traffic Safety (in Section III.C, Topical Responses, of this Final EIR), regarding impacts of signs on traffic safety.

**Comment No. 12-99**

| 33 | 3.10 Section B Items 18 | Studio Production District – Permitted Facilities and Uses | Item 18, Director's discretion - should be eliminated. |

**Response to Comment No. 12-99**

The comment appears to object to the proposed City Specific Plan provision that provides the Director of Planning discretion to permit uses similar to the listed permitted uses in the Studio Production District. Section 3.10.B.18 of the proposed City Specific Plan would allow flexibility to permit uses in the Studio Production District that are not enumerated, however, the uses would have to be similar to the enumerated uses. The comment does not address the environmental analysis in the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-100**

| 33 | 3.10 Section F | Studio Production District -Height The Community Plan calls for the commercial zones to be height District 1 -maximum 1.5:1 FAR and 45 feet for residential. (Exhibits 8a and 8b). Footnotes were added to the Community Plan sometime since it was enacted in 1998 that changed some areas to Height District1L, 1V1, and 2. This increased the heights significantly to 1L which is 75 feet and 75 feet or 6: 1 FAR in district 2. There is no indication of the date when this |
III.D.1  Written Letters

Response to Comment No. 12-100

The comment addresses the currently allowed and proposed heights for the Studio Production District within the proposed Universal City Specific Plan area, which consists of Planning Subareas 10 and 11. As discussed in the Draft EIR (Section II, Project Description, pages 268–271), portions of Planning Subareas 10 and 11 currently within the City are designated Regional Center, as well as Minimum and Medium Density Residential with corresponding zones of PB, RE15, and RE40 all within Height District 1. No portion of Planning Subareas 10 and 11 are in other Height Districts as the comment appears to suggest. The comment also raises questions regarding changes that may have occurred to the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan Land Use Map referenced as Exhibit 8a to the comment. Such questions are beyond the scope of this EIR. The comment references Los Angeles Municipal Code Section 12.22.A.23 as Exhibit 8b to the comment, which is not applicable to Planning Subareas 10 and 11 as those areas do not meet the definition for either Mini-Shopping Centers or Commercial Corner Development as defined in Los Angeles Municipal Code Section 12.03.

The comment appears to mistakenly interpret the proposed Universal City Specific Plan as allowing buildings 700 feet and 850 feet in height. However, as Figure 16 in the Draft EIR and Exhibit No. 5 of the proposed Universal City Specific Plan illustrate, the height zones proposed would limit building heights to 850 feet above mean sea level within Planning Subarea 10 and to 700 feet above mean sea level within Planning Subarea 11. The mean sea level height limit would allow buildings of up to 295 feet in Planning Subarea
10 and of up to 50 feet in height in Planning Subarea 11. These approximate building heights are summarized in Table 4 on page 298 of Section II, Project Description, of the Draft EIR. Section IV.D, Visual Qualities, of the Draft EIR (see pages 1066–1107) analyzed the potential impacts of the proposed maximum building heights relative to the visual character and views of valued visual resources and concluded that impacts would be less than significant as the Project would not result in substantial adverse changes with regard to contrast, prominence, and coverage from the vantage points analyzed.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-101**

<table>
<thead>
<tr>
<th>34</th>
<th>3.10</th>
<th>Studio Production District - Protected Trees</th>
<th>Removal of protected trees should not be allowed or should be severely restricted.</th>
</tr>
</thead>
</table>

**Response to Comment No. 12-101**

This comment is similar to Comment Nos. 12-80, 12-85, and 12-91, above. The commenter is referred to Response to Comment No. 12-80.

**Comment No. 12-102**

<table>
<thead>
<tr>
<th>34</th>
<th>3.10</th>
<th>Studio Production District - Signage</th>
<th>The signage permitted in the sign districts is so broad that there could be significant lighting intrusion and blight from those districts into the open space areas. We do not agree with the creation of the proposed sign districts. Please note that on Figure 20 “2B” is labeled as “Studio Technical Lot Sign District”(page 323) This area is actually part of the Studio Production District not part of the Technical Support Overlay Subdistrict [sic]. See (page 281). (Exhibits 9 and 9a)</th>
</tr>
</thead>
</table>
Response to Comment No. 12-102

The comment appears to suggest that the proposed signage in the Studio Production District would cause lighting intrusion and blight on the proposed open space areas. As shown on Figure 10, page 281 in Section II, Project Description, of the Draft EIR and Exhibit No. 2 of the proposed Universal City Specific Plan, the Studio Production District is located in the southwestern portion of the Project Site, at a considerable distance from the proposed Open Space Districts. See also Response to Comment No. 12-74, above, regarding the scope of analysis under CEQA.

The comment notes that Sign District 2B, the Studio Technical Lot Sign District, is within the Studio Production District not the Technical Support Overlay Subdistrict. Under the proposed Universal City Specific Plan, the Studio Production District includes 2 proposed sign districts, Sign District 2A, the Studio Administration Sign District which coincides with Planning Subarea 10 of the Studio Production District, and Sign District 2B, the Studio Technical Lot Sign District which coincides with Planning Subarea 11 of the Studio Production District. The land use districts and sign districts are correctly depicted and labeled on the referenced Figures 10 and 20 from Section II, Project Description, of the Draft EIR that are attached as Exhibit 9 and 9b of the comments.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-103

| 34 | 3.11 Section A and B | Land Use Equivalency Transfers | The Equivalency Program permits the development of a 500 room hotel in an area that already has two major hotels within the project site and several other hotels in the surrounding area. We object to the inclusion of Equivalency Transfers as part of this proposed specific plan. |

Response to Comment No. 12-103

The comment is the same as Comment No. 12-71 above. Please see Response to Comment No. 12-71.
### Comment No. 12-104

| 34 | Section 4 4.1 Items A and B | Design Standards – Height Zones, Height Exceptions and Sight Coverage, Massing and Height | The Community Plan provides that commercial development should complement any unique and existing development uses and requires reinforcement of desirable design characteristics and uses. (Exhibit l0a) We agree with those portions of the proposed project that foster studio uses and good permanent job creation. |

### Response to Comment No. 12-104

The comment states support for the portions of the Project that include studio uses and encourage job creation. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

### Comment No. 12-105

| 34 | Section 4 4.1 Items A and B | Design Standards – Height Zones, Height Exceptions and Sight Coverage, Massing and Height | The Community Plan also provides that commercial development should be directed toward the Los Angeles River and should promote the use of the river access for pedestrian trails and low intensity recreational uses. (Exhibit11). We object to the design of the proposed development as it does nothing to promote the Los Angeles River orientation. |

### Response to Comment No. 12-105

The comment appears to interpret a statement within the issues and opportunities portion of the Introduction chapter of the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan as a design policy for the Project Site, referenced as
Exhibit 11 to the comment. However, the Community Plan statement referenced in the comment and in the exhibit appears to be directed toward properties along the south side of the Los Angeles River Flood Control Channel between Coldwater Canyon and Laurel Canyon, not the Project Site.

As explained on pages 418–419 in Section IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft EIR, the northeastern portion of the Project Site that abuts the Los Angeles River Flood Control Channel is within the jurisdiction of the City of Los Angeles. The remaining approximately three-fourths of the northern edge of the Project Site is adjacent to River Road, a two-lane roadway that runs along the Los Angeles River Flood Control Channel. The majority of this northern edge is within jurisdiction of the County Los Angeles and the majority of the River Road roadway is owned by the Los Angeles County Flood Control District. As stated in the Draft EIR, the Applicant would cooperate with the County, City, and other agencies as necessary to accommodate the future use of the County land for public use, as contemplated by the County River Master Plan, and to continue use, if allowed by the County, of a portion of River Road for studio access.

As discussed on pages 523-524 of the Draft EIR, the Los Angeles River Revitalization Master Plan includes goals regarding revitalizing the river, enhancing its identity and restoring the functional qualities of the river/ecosystem and greening of neighborhoods by creating a continuous river greenway with connections to adjoining neighborhoods via safe public access. In the northeastern portion of the Project Site that is within the City’s jurisdiction and owned by the Applicant, the Project proposes a River Trailhead Park that would provide access to the river area, and connect the existing bike path along Forest Lawn Drive and the proposed bike path along the proposed North-South Road. The proposed Trailhead Park would also provide a linkage between the properties to the east and west of the Project Site via an on-site bicycle network that would travel along the proposed North-South Road and Universal Hollywood Drive, passing near Universal CityWalk. The proposed Trailhead Park, residential and commercial uses, and approximately 35 acres of open space and bicycle and walking trails within the Project Site would help enhance the river’s identity and restore its functional qualities by creating a series of connections between neighborhoods. In addition, the proposed City Specific Plan requires that new buildings within Planning Subarea 1 be located at least 12 feet from the channel wall of the Los Angeles River Flood Control Channel. Refer also to Response to Comment 12-93 with regard to the proposed RIO.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
**Comment No. 12-106**

<table>
<thead>
<tr>
<th>34</th>
<th>Section 4.1 Items A and B</th>
<th>Design Standards – Height Zones, Height Exceptions and Sight Coverage, Massing and Height</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>The Community Plan requires the density and design of development to be in proximity to station stops. We object to the design of the proposed development as it places all residential development as far away from the metro station as possible, eliminates easy access to the metro station by proposing to eliminate the east/west road and proposes public vehicular access to the station be through the torturous route of Buddy Holly Drive to Hotel Drive to Universal Hollywood Drive.</td>
</tr>
</tbody>
</table>

**Response to Comment No. 12-106**

The comment appears to interpret a statement within the issues and opportunities portion of the Introduction chapter of the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan as a design policy and density requirement for the Project Site. (Exhibit 12 is not referenced in the comment, but appears to be the corresponding exhibit, as it is a page from the Community Plan with the relevant language highlighted.) However, the Community Plan statement simply identifies as an opportunity in the Community Plan area the “[p]otential to determine the intensity, density and design of development in proximity to station stops.” (See page I-5 of the Community Plan).

The comment also questions the location of the residential development relative to the Universal City Metro Red Line Station. As described in Mitigation Measure B-2 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, a new shuttle service is proposed that would connect the proposed residences to the Universal City Metro Red Line Station and other key destinations.

The proposed shuttle route from Lakeside Plaza Drive to the Universal City Metro Red Line Station would include four to five stops along the North-South Road to provide residents within the Mixed-Use Residential Area with a stop located within a convenient walking distance (see Response to Comment No. 12-60). Please refer to Topical...
Response No. 5: Transit Mitigation (see Section III.C, Topical Responses, of this Final EIR), for further information regarding the proposed shuttle system.

**Comment No. 12-107**

| 34 | Section 4 4.1 Items A and B | Design Standards – Height Zones, Height Exceptions and Sight Coverage, Massing and Height | The Community Plan requires that the development establish design features that continue the early California Spanish style of architecture found at the Campo de Cahuenga transit site. We object to the design of the proposed development as it is not in keeping with the provisions of the Community Plan. (Exhibit 13) |

**Response to Comment No. 12-107**

The comment appears to interpret a statement within the issues and opportunities portion of the Introduction chapter of the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan as a design policy for the Project Site, referenced as Exhibit 13 to the comment. However, the Community Plan statement appears to be directed toward development on the west side of Lankershim Boulevard and not the Project Site. The comment does not address the environmental analysis in the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-108**

| 35 and 36 | Section 4 4.1 Items A and B | Design Standards – Height Zones, Height Exceptions and Sight Coverage, Massing and Height | We object to the density and height permitted in this proposed specific plan and to the inclusion of Height Exceptions within this proposed specific plan. No Height Exceptions should be included. |
Response to Comment No. 12-108

The comment objects to the Project’s density and heights in the proposed Universal City Specific Plan. The commenter is referred to Response to Comment Nos. 12-90 and 12-100. The comment does not address the environmental analysis in the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-109

| 38 | Section 4 4.1 Items B and number 5 and 6 | Design Standards – Screening of Rooftop equipment from above is not required. Screening of outdoor storage areas from views from above is not required | Screening of Rooftop equipment and outdoor storage areas from above shall be required as it will be within the view of existing uses. |

Response to Comment No. 12-109

The comment refers to the proposed City Specific Plan and addresses the screening of rooftop equipment and storage areas from above. Section 4.1.B 5 and 6 of the proposed Universal City Specific Plan requires rooftop equipment and storage areas to be vertically screened from the view of pedestrian public locations within 500 feet of the combined boundaries of the proposed Universal City and Universal Studios Specific Plan areas. In addition, Guideline AE9 of the proposed Universal City Design Guidelines, Appendix 2 to the proposed City Specific Plan, provides that mechanical equipment should be organized and designed as a component of the roofscape. Given the topography within the Project Site and the vicinity, the proposed height zones, and the distance to pedestrian public locations, it is anticipated that there would be limited visibility of rooftop equipment from above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-110

| 38 | Section 4 4.1 Items C numbers 2 and 3 | Design Standards – Setbacks and Landscape Buffers | We object to the incorporation of height exceptions within this proposed specific plan. |
Response to Comment No. 12-110

The comment objects to the Project’s Height Exceptions in the proposed Universal City Specific Plan. This issue has already been raised in Comment Nos. 12-66 and 12-108. The commenter is referred to Response to Comment Nos. 12-66 and 12-108, above.

Comment No. 12-111

| 38 | Section 4 4.1 Items C number 4 | Design Standards – Setbacks and Landscape Buffers – New buildings within Planning Subarea 1 shall be located at least 12 feet from the channel wall of the Los Angeles River. | Any new buildings in Planning Subarea 1 must conform to the provisions of the Los Angeles Rio Master Plan without exception. |

Response to Comment No. 12-111

Planning Subarea 1 includes the existing Lakeside Plaza office building. As the comment notes, pursuant to Section 4.1.C.4 of the proposed City Specific Plan, new buildings within Planning Subarea 1 shall be located at least 12 feet from the channel wall of the Los Angeles River Flood Control Channel. The issues raised in this comment have been addressed in Response to Comment No. 12-93. The commenter is referred to Response to Comment No. 12-93, above.

Comment No. 12-112

| 38 | Section 4 4.1 Item D number 1 | Design Standards – Visual Standards – no southeasterly facing Exterior Balconies shall be permitted above a height of 820 feet. | Buildings of this height create density and massing that is excessive. No balconies should be allowed at all in this area. We object to any building above two stores [sic] in this area as it will significantly increase the congestion at the immediately surrounding intersections which already show an LOS of F and block views. |
Response to Comment No. 12-112

The comment incorrectly correlates building height and traffic congestion. The amount of traffic generated by the Project’s residential development, per Los Angeles Department of Transportation protocols, is based on the number of units and their associated trip generation.

Regarding views, the Draft EIR (Section IV.D. Visual Qualities, pages 1066-1107) analyzed the potential impact of the Project with the building heights described in Table 4 on page 298 of Section II, Project Description, of the Draft EIR, to the visual character and views of valued visual resources and concluded that impacts would be less than significant as the Project would not result in substantial adverse changes with regard to contrast, prominence, and coverage from the vantage points analyzed.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-113

| 38 | Section 4 4.1 Item D number 2 | Design Standards – Visual Standards – Unscreened rooftop parking. | All rooftop parking must be screened. |

Response to Comment No. 12-113

The comment addresses the screening of rooftop parking. As set forth in Section 4.1.D.2 of the proposed Universal City Specific Plan, no unscreened rooftop parking shall be permitted on any parking structure within 500 feet of a property line of any Existing Off-Site Residential Uses. Additional advisory guidelines for parking in the Mixed-Use Residential Area are included in the proposed Universal City Design Guidelines referenced in Section 4.1.D.4, and attached as Appendix No. 2, of the proposed Universal City Specific Plan, attached as Appendix A-1 to the Draft EIR. For example, Guideline SE15 provides that parking structure roofs, particularly adjacent to residential structures should be attractively finished with landscaping, walking surfaces or recreational uses where feasible and permitted. The comment does not address the environmental analysis in the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
### Comment No. 12-114

| 39 | Section 4.1 Item D number 4 | Design Standards – Visual Standards – Appendix 2. Design Guidelines | We object to the use of the design guidelines included in Appendix 2 as they define as a planning goal the creation of an urban community. An urban setting is not consistent with the suburban scale and character of the surrounding community. The San Fernando Valley is generally a suburban and rural area and not an urban area. We object to the inclusion of a Mid-rise/High-rise Town Center and two Mid-rise/High-rise Residential Areas in an area that is suburban in nature and located at a choke point of the 101 Freeway at the throat of the Cahuenga Pass. |

### Response to Comment No. 12-114

The comment objects to the proposed Universal City Design Guidelines, Appendix 2, of the proposed Universal City Specific Plan and the characterization of the Project Site as an urban area. The comment also objects to the inclusion of Mid/High-Town Center and Mid/High-rise Residential areas apparently for traffic congestion reasons.

The commenter is referred to Response to Comment No. 12-4.

The comment appears to reference an urban design concept set forth in the Introduction to the proposed Universal City Design Guidelines. The term urban design is the collective term generally used to describe the process of designing cities, towns and villages. It is not meant to distinguish between urban and suburban areas. As explained on page 2 of the proposed Universal City Design Guidelines, a few key urban design concepts work together to provide a framework for future design and construction in the proposed Mixed-Use Universal City District. The concepts include the creation of an urban community with character derived from its unique site, sense of place, diversity of building forms, and architectural styles organized within a framework of attractive streetscapes, open spaces and public places; the creation of a pedestrian and transit oriented community.
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providing connectivity for pedestrians, bicycles and cars, as well as access to transit; the creation of a mixed-use community that meets residents' need for diverse housing types, retail uses, public facilities, community-serving amenities, parks and open space; and the creation of a sustainable community that addresses the importance of protecting the environment. (See page 2 of the proposed Universal City Design Guidelines, Appendix 2 to the proposed City Specific Plan, attached as Appendix A-1 to the Draft EIR). These urban design concepts encourage the improvement of communities and would be desirable by most planner and neighborhoods residents regardless of whether an area is considered urban or suburban.

With regard to freeway traffic, impacts on freeway segments were analyzed in Section IV.B.1, Traffic/Access – Traffic/Circulation. As discussed on page 692 of the Draft EIR with implementation of the project design measures and transportation mitigation measures, significant impacts would remain at 6 freeway segments, including the Hollywood Freeway south of Barham Boulevard. See Response to Comment Nos. 12-5 and 12-7 regarding residual significant impacts and the California Environmental Quality Act. The commenter is referred to Topical Response No. 6: Freeway Improvements, in Section III.C, Topical Responses, of this Final EIR.

**Comment No. 12-115**

| 39 | Section 4 4.1 Item D number 4 | Design Standards – Visual Standards – Appendix 2. Design Guidelines | At a time when there is no demonstrative need for additional residential housing in Los Angeles in general and the San Fernando Valley in particular, there is no need to build housing that is not in keeping with the scale and character of the surrounding suburban community. If any housing is permitted as part of this development at all it should be a Low-rise residential area only. California's growth rate has declined to a modest 10% over the past 10 years and as a result, for the first time since the census taking in 1930, California did not get any additional congressmen (Exhibit 14) |
Response to Comment No. 12-115

This comment on the proposed City Specific Plan is related to design standards and opines that no additional housing is needed in Los Angeles. The comment also references Exhibit 14 to the comment, which is a December 2010 news article regarding California’s congressional seats that notes that California is not adding any congressional seats in response to the census for the first time since 1930. The comment does not address the environmental analysis in the Draft EIR.

According to the City’s 2006–2014 Housing Element, the City is projected to need to add 112,876 new units by 2014, or an average of 12,542 units per year over the 2006–2014 period. In comparison, based on residential building and demolition permits issued in the City for the 2009 calendar year, the City experienced a net gain of 1,177 residential dwelling units (comprised of a net gain of 1,228 multi-family units and a net loss of 51 single-family units), an amount that is approximately 9.4 percent of the average annual total required to meet the RHNA forecast. As such, the additional housing units added by the Project would provide a substantive positive impact with regard to this issue. The commenter is also referred to Response to Comment No. 12-4, above.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-116

| 39 | Section 4 4.1 Item D number 4 | Design Standards – Visual Standards – Appendix 2. Design Guidelines | We object to the development of a Mid-rise/High-rise residential area that is 10 or more stories high that will block the protected views of the existing residential neighborhood which this proposed development will surround. |

Response to Comment No. 12-116

Regarding views, the Draft EIR (Section IV.D, Visual Qualities, pages 1066–1107) analyzed the potential impact of the Project with the building heights described in Table 4 in Section II, Project Description, of the Draft EIR (page 298) to the visual character and views of valued visual resources and concluded that impacts would be less than significant as the Project would not result in substantial adverse changes with regard to contrast,
prominence, and coverage from the vantage points analyzed. Also, refer to Response to Comment Nos. 12-17, 12-59, 12-84, 12-90, and 12-100. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-117**

| 39 | Section 4 4.1 Item D number 4 | Design Standards – Visual Standards – Appendix 2. Design Guidelines | The proposed inclusion of basement apartments in the design guidelines in an area where the water table has historically only 15 feet below the surface is not prudent. (Exhibit 15). We object to this inclusion of basement apartments in the design guidelines. |

**Response to Comment No. 12-117**

Due to the variation in topography and grade within the proposed Mixed-Use Universal City District, the grade may vary greatly from one side to another of a multi-family residential building. As a result, there may be conditions where the ground-level entry of a building may be at a lower grade than the street and sidewalk grade on another side of the building, which might cause ground-level apartments to be below the adjacent higher grade. The design guidelines referenced in the comment (proposed Universal City Design Guidelines SE 22 and 23 in Appendix 2 to the proposed City Specific Plan) are proposed to ensure that occupied spaces at the ground level in these conditions are provided ample daylight and open space outside the occupied spaces. The guidelines also would ensure a separation between the public sidewalk at the higher grade and the semi-private open space adjacent to ground-floor units.

Potential impacts from construction and operational groundwater dewatering were analyzed in detail in Section IV.G.2, Water Resources – Groundwater, of the Draft EIR. Groundwater in the Mixed-Use Residential Area has been encountered from 21 feet below ground surface to 34 feet below ground surface. (See page 1411 of the Draft EIR.) As discussed on pages 1424–1430 of the Draft EIR, potential Project dewatering is not anticipated to draw water across any substantial distance and impacts are considered negligible from a local and regional basin perspective. In addition, there are no groundwater production wells or public water supply wells within 1 mile of the Project Site. Since no water supply wells would be affected and construction dewatering is not
anticipated to adversely impact the rate or direction of flow of groundwater, no significant impact from construction of the proposed Project is anticipated to groundwater hydrology. (Draft EIR, page 1425.) Further, no significant areas of groundwater contamination have been identified at the Project Site and the majority of the Project Site does not overlay or have a connection with the San Fernando Groundwater Basin. Therefore, as explained in more detail on pages 1425-1426 of the Draft EIR, a less than significant impact would occur with respect to groundwater quality from the construction of the proposed Project.

In addition, no long-term dewatering is anticipated with the operation of the Project. However, if dewatering is required, it would be conducted in accordance with applicable regulatory requirements. As explained on pages 1427-1430 of the Draft EIR, operational dewatering is not anticipated to draw water across any substantial distance and impacts are considered negligible from a local and regional basin perspective. Since no water supply wells would be affected and dewatering is not anticipated to adversely impact the rate or direction of flow of groundwater, the operation of the Project is not expected to have a significant impact on potable water levels. Further, as discussed above with regard to construction dewatering, a majority of the Project Site does not have a hydrologic connection with the San Fernando Groundwater Basin, and no significant areas of groundwater contamination have been encountered beneath the Project Site. The estimated maximum flow of dewatering is low, and the radius of influence on groundwater is limited. Therefore, dewatering is not anticipated to draw water across any substantial distance. As such, no substantial impacts are anticipated to the rate or direction of movement of any existing contaminants beneath the Project Site or the area affected by or the level of groundwater contaminants. In addition, as stated above, there are no groundwater production wells or public water supply wells within one mile of the Project Site. Since Project operation would not cause substantial alterations in groundwater contaminants beneath the site due to dewatering, a less than significant impact is anticipated. Therefore, no significant impact to groundwater hydrology or groundwater quality is anticipated.

**Comment No. 12-118**

| 39 | Section 5 Items A, B, C, D and E | Parks and Open Space – Location/No Dedication Required/Fulfillment of Open Space Obligation | We object to the inclusion of open space on rooftops. |

City of Los Angeles
Final Environmental Impact Report

NBC Universal Evolution Plan
July 2012
Response to Comment No. 12-118

The comment does not address the environmental analysis in the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-119

| 39 | Section 5, Items A, B, C, D and E | Parks and Open Space – Location/No Dedication Required/Fulfillment of Open Space Obligation | We object to the provision of the proposed specific plan that states “Required open space need not be dedicated to the City as publicly owned property.” Although we agree that the property owners association should be required to maintain the open space, the land should be dedicated to the City. |

Response to Comment No. 12-119

As provided in Section 5 of the proposed City Specific Plan, and discussed in Section IV.K.4, Public Services – Parks and Recreation, of the Draft EIR, park or recreation space in an amount equal to 200 square feet per Dwelling Unit within the City Specific Plan area shall be provided to meet the recreation needs of residents. The required open space would not have to be dedicated to the City as publicly owned property. The property owners association would be responsible for the ownership and maintenance of the park and recreation space. As set forth in Section 5.F of the proposed City Specific Plan, the parks would be developed in general accordance with the Conceptual Parks and Open Space Plan, Figure 211 on page 1790 of the Draft EIR, and a phasing and implementation plan shall be developed prior to issuance of a building permit for a Project under the City Specific Plan.

In other words, and as stated on page 1798 of Section IV.K.4, Public Services – Parks and Recreation, of the Draft EIR, following Project approval, the Applicant would be required to execute and record covenants pursuant to Section 5(a) of the proposed City Specific Plan that would bind any and all future owners of property in the subdivided residential area to require the park and recreational space required under the proposed City Specific Plan to be restricted for such uses accessible to the general public in perpetuity, and the City can enforce this requirement.
Comment No. 12-120

| 39 | Section 5 Items A, B, C, D and E | Parks and Open Space - Location/No Dedication Required/Fulfillment of Open Space Obligation | Payment of fees in lieu of providing open space should not be permitted. |

Response to Comment No. 12-120

The Quimby Act, Section 66477 of the California Government Code, authorizes cities and counties to enact ordinances that require the dedication of land, payment of fees in lieu thereof, or a combination of both, for park or recreational purposes as a condition to the approval of a tentative or parcel map. (See Section IV.K-4, Public Services – Parks and Recreation, of the Draft EIR, page 1771.) As authorized by the Quimby Act, the City of Los Angeles has established a local ordinance, Los Angeles Municipal Code Section 17.12, requiring land dedication or payment of fees for park or recreational purposes for projects involving residential subdivisions. (Draft EIR, pages 1776–1777.) In subdivisions containing more than 50 dwelling units, the City permits developers to dedicate parkland in lieu of paying fees. (Draft EIR, pages 1777.) As permitted under the Quimby Act, Los Angeles Municipal Code Section 17.12 allows a subdivision to credit the monetary value of parkland improvements and private recreation facilities against the requirement to dedicate land and/or pay in-lieu fees. (Id.) Accordingly, as required by Section 5.A of the proposed Universal City Specific Plan, the Project would provide park or recreation space in an amount equal to 200 square feet per Dwelling Unit within the Specific Plan area and associated equipment and improvements to meet the recreation needs of residents and fulfill the Project’s open space obligations. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-121

| 39 | Section 5 Item F | Parks and Open Space - Implementation | Development of a phasing and implementation plan prior to the issuing of a building permit for a project is not sufficient. Specific requirements for the development and completion of parks and open space as each section of the project is completed must be included. The developer should be |
Response to Comment No. 12-121

As stated in Response to Comment No. 12-120 above, as required by Section 5.A of the proposed City Specific Plan, the Project would provide park or recreation space in an amount equal to 200 square feet per Dwelling Unit within the proposed Specific Plan area and associated equipment and improvements to meet the recreation needs of residents and fulfill the Project’s open space obligations. The comment does not address the environmental analysis in the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-122

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<th>Comment No. 12-122</th>
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Response to Comment No. 12-122

This comment is similar to Comment No. 12-61 above. The commenter is referred to Response to Comment No. 12-61 above, regarding the East/West Road. The comment...
is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-123**

| 40 | Section 6 D | Street lighting | No guidelines for street lighting could be located in Appendix No.2, Design Guidelines as is stated on page 40. |

**Response to Comment No. 12-123**

Street lighting shall be implemented consistent with City requirements. The proposed City Specific Plan will be modified to delete the reference to street lighting guidelines.

**Comment No. 12-124**

| 40 | Section 7 | Transportation and Parking | Comments on Transportation and Parking are included in a separate section of this document. |

**Response to Comment No. 12-124**

The comment indicates that comments on transportation and parking are provided in another section of the comment letter. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-125**

| 48 | Section 9.3 | Sign Districts | We do not agree with the creation of the six sign districts as part of this specific plan. The only signage that should be permitted in the specific plan area should be those that are in compliance with the 2002 Los Angeles City Sign Ordinance. For safety reasons and for protections of views no |
written letters

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signs should be allowed on roofs. No offsite signage, supergraphics or animated signs should be allowed at all.

Response to Comment No. 12-125

This comment is substantially the same as Comment No. 12-98 above. Please see Response to Comment No. 12-98 regarding proposed signage.

Comment No. 12-126

<table>
<thead>
<tr>
<th>73</th>
<th>Section 11</th>
<th>Protected Trees</th>
</tr>
</thead>
</table>
|    |            | The DEIR refers the reader to Appendix No.5 - Master Protected Tree Map. The 4 maps that are included therein show that removal of hundreds of protected trees would be permitted by the specific plan. Many of these trees are heritage trees with huge canopies that could take a hundred years to grow. Allowing removal and replacement of these trees with seedlings and 1 gallon container trees as would be permitted under Section 11 C.1.b of this proposed specific plan is not acceptable.

Response to Comment No. 12-126

The potential impacts of the Project’s removal of Protected Trees were analyzed in detail in Section IV.I, Biota, of the Draft EIR. Contrary to the commenter’s assertion, the NBC Universal Evolution Plan Tree Report (Appendix K-2 of the Draft EIR) found no heritage trees on-site. Further, as discussed on pages 1585–1588 of Section IV.I, Biota, of the Draft EIR, the analysis of impacts on protected trees represents a conservative analysis, and project design features and mitigation measures have been developed assuming the maximum potential tree impact numbers. The actual tree impact numbers may be lower than anticipated, once final grading plans are developed. In addition, the proposed City Specific Plan and County Specific Plan regulations incorporate flexibility in
the tree replacement approach, such that a combination of sizes and protected species would be planted, resulting in a more natural habitat approach to tree replacements and replacing the overall habitat value of the trees removed. As explained on page 19 of Appendix K-2 of the Draft EIR, the NBC Universal Evolution Plan Tree Report, the goal of the mitigation program is the “creation of a landscape that maximizes the compensation for lost habitat values while fully addressing the need to provide a community landscape that reflects the natural heritage of the landscape.” The mitigation program reflects consideration of an overall landscape theme and wildlife benefit. Table 138 on page 1575 in Section IV.1, Biota, of the Draft EIR provides the 20-year replacement canopy growth rate for the various stock sizes of City-protected trees identified on the Project Site. As explained on page 20 of Appendix K-2, the 20-year replacement canopy growth rate is a method of tree valuation employed by the City of Los Angeles. For this approach, the total area of impacted tree canopy is used as a target for the replacement container stock growth after 20 years. For additional detail on the methodology for calculating the 20-year replacement canopy growth rate, see the May 17, 2011 letter from Michael Huff, Manager, Urban and Country Forestry, Dudek (see Appendix FEIR-10 of this Final EIR).

As discussed on pages 1585–1586 of the Draft EIR, with implementation of the Protected Tree regulations in the proposed City Specific Plan and Mitigation Measure I-4, which includes tree protection and enhancement measures from pre- to post- construction, potential impacts would be reduced to a less than significant level.

**Comment No. 12-127**

<table>
<thead>
<tr>
<th>73</th>
<th>Section 11</th>
<th>Protected Trees</th>
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</thead>
<tbody>
<tr>
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<td>Los Angeles is one of the top ten dirtiest cities in America in terms of air quality. (Exhibit 17) Removal of hundreds of large canopy, heritage trees, that are fundamental to absorption of carbon dioxide and creation of oxygen, should not be permitted.</td>
</tr>
</tbody>
</table>

**Response to Comment No. 12-127**

See Response to Comment No. 12-126 above regarding the analysis of potential impacts related to protected tree removal. The balance of carbon sequestration associated with the removal and long-term replacement of trees is part of the Project’s greenhouse gas inventory. (Draft EIR, Section IV.O, Climate Change, Table 207.) The Climate
Change Technical Report prepared by CTG Energetics, 2010, included as Appendix Q to the Draft EIR, summarizes the changes in carbon sequestration.

Further, the potential air quality impacts of the proposed Project are analyzed in Section IV.H, Air Quality, of the Draft EIR.

Regarding protected (or heritage) trees, the commenter is referred to Response to Comment No. 12-126, above.

**Comment No. 12-128**

| 76  | Section 11 C.2.c | Pay an in lieu fee of $700 for each removed Protected Tree | Payment of an in lieu fee for the removal of a Protected Tree should not be allowed. Tree replacement shall not be allowed outside the specific plan area. |

**Response to Comment No. 12-128**

As provided in Section 11 of the proposed City Specific Plan, if replacement trees are planted at an off-site location, such location shall be determined in consultation with the Planning Director and the Council District office. If an in lieu fee is paid, the fee shall be deposited into a segregated trust fund for the planting of replacement trees. The comment does not address the environmental analysis in the Draft EIR.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. See also Response to Comment No. 12-126, above, for additional information regarding protected trees.

**Comment No. 12-129**

| 77  | Section 11 C.4 | Exemptions - all trees other than the Coast Live Oak, California Sycamore and the California Black Walnut are not subject to any other tree regulations established by the Municipal Code or City Policy and may be removed. | We do not agree with this exemption. All provisions of the Municipal Code and City Policy must be followed with respect to trees not specifically covered in this specific plan. |
Response to Comment No. 12-129

The comment objects to the proposed Universal City Specific Plan exemption for all trees other than those regulated by the Specific Plan from any tree regulations established by the Municipal Code or City Policy. The Los Angeles Municipal Code currently includes as “Protected Trees” Oak trees, California Sycamore, Southern California Black Walnut, and California Bay Laurel. (LAMC Section 46.01.) The proposed Universal City Specific Plan similarly defines Protected Trees to include Oak trees, California Sycamore, Southern California Black Walnut, and California Bay Laurel. (Proposed Universal City Specific Plan, Section 2.3.) In addition, the Tentative Tract Map filing guidelines issued by the City’s Department of Planning require full mapping of trees with trunk diameters of 12 inches or greater and the replacement of desirable mature trees. As discussed on pages 1585–1586 of Section IV.I, Biota, of the Draft EIR, the proposed City Specific Plan Protected Tree regulations are functionally equivalent to the tree replacement requirements of the City ordinance. The proposed City Specific Plan regulations incorporate flexibility in the tree replacement approach such that a combination of sizes and protected tree species would be planted resulting in a more natural habitat approach to tree replacement and replacing the overall habitat value of the trees removed. As noted in the NBC Universal Evolution Plan Tree Report (Appendix K-2 to the Draft EIR), the placement of the replacement native trees into a landscape that incorporates the similar climate-adapted Southern California landscape will serve to enhance the long-term survival of the native tree plantings and will also enhance the wildlife values of those trees.

The comment does not address the environmental analysis in the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-130

| 77 | Section 12 B item 1 | Lighting - New Light Sources | Animated, moving, programmed, flashing, neon, LCD and similar technologies of lighting displays or installations should not be permitted if such lighting is visible from the 101 Freeway or any of the existing residences in the surrounding communities. Such light sources are intrusive and diminish the quality of life of the residents in the surrounding communities. |

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Response to Comment No. 12-130

The proposed City and County Specific Plans include a comprehensive set of regulations that limit Light Sources at the Project Site. For example, with certain exceptions, Light Sources shall be designed so as to produce not more than 2 foot candles of illumination as measured at the property line of the nearest residentially zoned property outside the combined boundaries of the proposed City and County Specific Plan areas. With regard to signage lighting, the proposed City and County Specific Plans would limit the light from Electronic Message Signs from sunset to 2:00 A.M., and require that illuminated signage be turned off from 2:00 A.M. to 7:00 A.M. As discussed in Appendix G, Artificial Light Technical Report, of the Draft EIR, the impact of the illuminated signs was evaluated at various receptor sites around the Project Site which had a prominent view of the Project Site (see Appendix G, pages 129–137). The modeling analysis confirmed that with implementation of the signage regulations in the proposed City and County Specific Plans, proposed signage would not result in significant light trespass or brightness impacts at any of modeled viewpoints. Therefore, light trespass or brightness impacts from the Project’s potential signage lighting would be less than significant. (Section IV.E.2, Light and Glare – Artificial Light, of the Draft EIR, page 1275; Appendix G, pages 134, 136–137.)

Regarding freeway visibility, see Response to Comment No. 12-97 above. See also Topical Response No. 9: Signage and Traffic Safety (see Section III.C, Topical Responses, of this Final EIR).

Comment No. 12-131

<table>
<thead>
<tr>
<th>77</th>
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<td></td>
<td>Light Sources associated with Outdoor Special Light Effects should not be permitted if such lighting is visible from the 101 Freeway or any of the existing residences in the surrounding communities.</td>
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Response to Comment No. 12-131

The comment raises issues similar to Comment No. 12-97. The commenter is referred to Response to Comment 12-97 above.
**Comment No. 12-132**

| 79 | Section 13 A Item 1. | Sound Attenuation | Sound Attenuation regulations should apply not only to existing residential areas but should also apply to any residences which are constructed as part of the proposed project. |

**Response to Comment No. 12-132**

The comment does not address the environmental analysis in the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. See also Response to Comment No. 12-74 regarding the scope of review under CEQA.

**Comment No. 12-133**

| 79 | Section 13 A Item l.a and l.b | Sound Attenuation | Sound Attenuation regulations should be in accordance with the guidelines of the General Plan. Noise levels of \( L_{70} \) of 70 dBA should not be allowed. Continuous levels of 70 dBA or higher can cause loss of hearing. As stated in the General Plan, all noise should be reduced or managed to achieve or maintain healthful ambient sound levels. Noise levels of 70 dBA are normally unacceptable see General Plan Exhibit 1 Guideline for Noise compatible Land Use (Exhibit 18) |

**Response to Comment No. 12-133**

The comment references a noise level of \( L_{70} \) of 70 dBA. This corresponds to a noise level of 70 dBA occurring over 70 percent of the noise measurement period. This does not correspond to any of the noise standards established by the City of Los Angeles or...
proposed by the Project. The General Plan noise level of 70 dBA referenced later in the comment refers to a Community Noise Equivalent Level (CNEL), which is a noise measure that considers noise occurring over a 24-hour period. As set forth in Section 13 of the proposed City Specific Plan and discussed on page 996 in Section IV.C, Noise, of the Draft EIR, the proposed Universal City Specific Plan provides that operational noise in the City portions of the Project Site will be subject to the Los Angeles Municipal Code’s noise regulations, as well as the following additional limits for daytime and nighttime operational noise:

- Between 7 A.M. and 10 P.M: L50 of 50 dBA or the Ambient Noise level if greater than 50 dBA; Lmax of 70 dBA or the Ambient Noise level if greater than 70 dBA.
- Between 10 P.M. and 7 A.M. L50 of 45 dBA or the Ambient Noise level if greater than 45 dBA; Lmax of 65 dBA or the Ambient Noise level if greater than 65 dBA.
- No outdoor amplified sound associated with retail uses, community serving uses, and sound systems for common areas of residential uses, other than emergency address systems, shall be permitted in the Mixed-Use District.

These proposed limitations are consistent with the General Plan. The 70 dBA limit contained in the proposed City Specific Plan is an Lmax measurement. Lmax is the maximum noise level measured during a measurement period, and is used to regulate impulsive or intermittent sounds, and not continuous noise levels.

**Comment No. 12-134**

| 79 | Section 13 A Item l.a and l.b | Sound Attenuation | Permitting night time noise levels between the hours of 10:00 PM and 7:00 AM in a residential area equivalent to heavy traffic in a commercial district is not acceptable. |

**Response to Comment No. 12-134**

The Draft EIR provides a comprehensive analysis of both potential daytime and nighttime noise impacts resulting from the Project’s operation (see Section IV.C, Noise, pages 998–1019). As noted on Tables 69 and 70 of the Draft EIR, the Project’s operational noise would result in less than significant impacts during both daytime and nighttime hours, with nighttime noise levels falling well below the significance threshold in most instances.
With regard to construction impacts, the Draft EIR analyzed various potential construction scenarios, and the modeling was conducted to determine the potential construction noise impacts at all 47 receptor locations during the noisiest construction phase. Pages 998–1009 of the Draft EIR summarize the construction impacts under all potential construction scenarios, including construction in the Studio, Entertainment, and Business Areas; construction in the Mixed-Use Residential Area assuming both single-phase and multi-phase horizontal construction activities; and a composite construction scenario in which construction occurs throughout the Project Site at the same time. With regard to nighttime noise resulting from construction activities, the analysis found that noise levels may exceed nighttime noise standards at certain locations without any mitigation measures implemented. However, it is important to note that the Draft EIR proposes several construction mitigation measures for general construction activities, as well as mitigation measures specifically designed to generally reduce nighttime construction noise to less than significant levels for the construction scenarios. For example, Mitigation Measure C-2 prohibits nighttime construction and grading activities, except for under limited circumstances. As noted on page 1036 of the Draft EIR, because “these limited types of nighttime construction activities would have the potential to exceed the established significance thresholds, the Draft EIR recognizes that a significant impact could occur. It is important to note that while a significant impact could result under these limited circumstances, the likelihood that these circumstances would actually occur is limited, and when they do occur, the extent of this significant impact would be limited in duration.”

**Comment No. 12-135**

| 80 | Section 13 B Item 1 | Sound Attenuation -Exemptions | Exempting all production activities from the provisions of the noise regulations of this specific plan and from the provisions of the Municipal Code is not acceptable. |

**Response to Comment No. 12-135**

Currently, the majority of the production activities on the Project Site occur in the existing County portions of the Project Site. The County Code exempts production activities from the County noise standards. Under the proposed Project, portions of the existing Back Lot Area would be annexed from the County into the City. As provided in Section 3.4 of the proposed City Specific Plan, the Existing Uses in this area may continue within each of the applicable Planning Subareas until a building permit for a residential building is issued within that Planning Subarea. The proposed exemption from the noise.
regulations in the City’s Municipal Code would maintain the existing conditions and allow for consistent regulation for production activities across the Project Site.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-136**

| 80 | Section 13 C Item 1 | Construction and Grading Sound Requirements | The use of vibro hammers or similar equipment should not be permitted in any construction within this specific plan area. |

**Response to Comment No. 12-136**

As discussed in Project Design Feature C-1 on page 1031 in Section IV.C, Noise, of the Draft EIR, despite resulting in a less efficient and more costly construction equipment mix, the Project has chosen to not include pile driving as part of its construction equipment mix, in order to minimize noise and vibration impacts to the surrounding community.

Ground-borne vibration impacts were analyzed in Section IV.C.3.d.(2) of the Draft EIR. As discussed in more detail on page 1013 of the Draft EIR, based on the analysis performed and adjusting for distance, construction vibration impacts would be less than significant at all off-site locations, with one exception. The analysis concluded that construction activity on the southern portion of the proposed grading area within the Mixed-Use Residential Area may yield significant vibration impacts due to the construction equipment’s potential proximity to the Project Site’s eastern property line. With implementation of recommended Mitigation Measure IV.C-3, which limits the type and location of construction equipment that can be used in a defined area of the Mixed-Use Residential Area, vibration impacts would be reduced to a less than significant level.

**Comment No. 12-137**

<table>
<thead>
<tr>
<th>82</th>
<th>Section 15</th>
<th>Substantial Compliance Analysis</th>
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<tbody>
<tr>
<td></td>
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<td>We do not agree with the proposal to replace the Project Permit Compliance provisions of Section 11.5.7. C of the Municipal Code. This will eliminate local community input by enabling applicants [sic] bypass all local area decision makers such as the Area Planning...</td>
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<tr>
<td>Section</td>
<td>Item</td>
<td>Subsection</td>
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</table>
**Response to Comment No. 12-137**

The comment is similar to Comment Nos. 12-65 and 12-66. As such, refer to Response to Comment Nos. 12-65 and 12-66.

**Comment No. 12-138**

| Section 15 Item 1 through [sic] 5 | Exempt Uses | Other than the Existing Uses permitted by Section 3.4 of this Specific Plan none of the other uses listed should be defined as an exempt use. |

**Response to Comment No. 12-138**

The comment is similar to Comment No. 12-67. As such, please refer to Response to Comment No. 12-67.

**Comment No. 12-139**

| Section 15.2 | Other Specific Plan Procedures | We object to the inclusion of this provision as it reduces transparency and reduces local community input. This section should be eliminated and the authority of the Area Planning Commission should be retained by it and not transferred to the City Planning Commission. |

**Response to Comment No. 12-139**

Section 15.2 of the proposed City Specific Plan provides that the procedures for adjustments, exceptions, amendments, and interpretations of the Specific Plan shall follow the procedures of Section 11.5.7.E-H of the Los Angeles Municipal Code, however, the City Planning Commission rather than the Area Planning Commission shall have the authority to act. The comment does not address the environmental analysis in the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
### Comment No. 12-140

| Universal Studios Specific Plan | Due to the voluminous nature of the DEIR and the limited time allowed for the submission of comments, a detailed review and analysis of the provisions of the Universal Studios Specific Plan has not been undertaken. Therefore, all comments related to the Universal City Specific Plan should be considered to be applicable to any comparable provision of the Universal Studios Specific Plan. |

### Response to Comment No. 12-140

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

With regard to the time for review of the Draft EIR, consistent with the requirements of CEQA, the Draft EIR was submitted to the State Clearinghouse, Office of Planning and Research, and was originally circulated for public review for a 61-day period, or 16 days more than the CEQA-required 45-day review period. This 61-day comment period began November 4, 2010, and ended January 3, 2011. In response to requests to extend the review period, on November 18, 2010, the comment period was extended by an additional 32 days to February 4, 2011. Thus, the Draft EIR was circulated for a 93-day public review period, which is more than double the 45-day public review period required by CEQA Guidelines Section 15105 when a Draft EIR is submitted to the State Clearinghouse for review by state agencies. In addition, a public comment meeting was held on December 13, 2010. The commenter is also referred to Topical Response No. 1: EIR Process (see Section III.C, Topical Responses, of this Final EIR).

### Comment No. 12-141

| | Conclusion: The Specific Plans are an attempt to circumvent most of the sign and other regulations of the municipal |

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Response to Comment No. 12-141

The comment addresses issues previously raised in this letter by the commenter. Refer to Response to Comment Nos. 12-52 and 12-59.

Comment No. 12-142

STUDIO CITY NEIGHBORHOOD COUNCIL COMMENTS ON TRAFFIC IMPACTS OF THE PROJECT

| 45 | 2(A)(1)(i) | Environmental Impacts Construction: Construction traffic and/or construction activities could cause travel delays on an intermittent basis during build out of the Project. Potential impacts associated with physical construction of the Project would be limited to those locations immediately adjacent to or those within the Project Site. The most notable of these impacts would occur with the widening of Lankershim Boulevard, Barham Boulevard, and Buddy Holly Drive, which would require a temporary reduction in lane capacity (one lane in one direction) and would cause delays for vehicles traveling in that code and to thwart local community input into the planning process. We object to their planning process. We object to their adoption as part of the entitlement process for the Project Site. |

Delays along Lankershim will cause traffic delays for the Island Neighborhood of Studio City, yet Studio City is not identified in the DEIR as an impacted community.

The Island Neighborhood of Studio City has one point of ingress and egress and would be heavily impacted by the construction activities on Lankershim Blvd.
Response to Comment No. 12-142

While the Project would result in increased traffic along Lankershim Boulevard, the Project would not isolate the residential area to the west of Lankershim Boulevard as vehicular and pedestrian access would be maintained. The potential transportation impacts of the Project were analyzed in Section IV.B, Traffic, of the Draft EIR. An extensive series of project design features and mitigation measures have been identified to address the Project’s traffic impacts. Specifically with regard to Lankershim Boulevard, Mitigation Measure B-6 includes various improvements along the Lankershim Boulevard corridor. While these measures would substantially reduce the Project’s intersection impacts, significant and unavoidable impacts would remain at nine intersections, including the following intersections along Lankershim Boulevard: Lankershim Boulevard and Cahuenga Boulevard (morning peak hour); Lankershim Boulevard and Main Street (afternoon peak hour); Lankershim Boulevard and Jimi Hendrix Drive (afternoon peak hour), and Lankershim Boulevard and Campo de Cahuenga Way/Universal Hollywood Drive (morning peak hour). The Project’s mitigation program includes all feasible mitigation measures to reduce the Project’s impact at these intersections to a level below significance; however, due to physical constraints and/or existing buildings, no feasible mitigation measures can be implemented to reduce the Project’s intersection level of service impact at these locations to a level below significance. It should be noted, however, that with the proposed project design features and mitigation measures, impacts at the intersection of Valleyheart Drive/James Stewart Avenue/Lankershim Boulevard, which is the access point into the Island area, would be less than significant. (Draft EIR, Figure 86, page 935.)

With regard to in-street construction impacts along Lankershim Boulevard, as discussed on pages 681–682 and 693 of the Draft EIR, with the implementation of Mitigation Measure B-44 (Mitigation Measure B-41 in the Draft EIR), which requires the preparation of construction traffic management plans to address potential construction impacts based on the nature and timing of the Project’s specific construction and other projects in the vicinity of the Project Site, impacts related to in-street construction would be less than significant. To the extent that the comment is referring to neighborhood intrusion impacts, the Island neighborhood is within the Project transportation analysis study area. As stated on page 592 of the Draft EIR, the transportation study area encompasses a geographic area of approximately 50 square miles, generally bounded by Burbank Boulevard in the community of North Hollywood and the City of Burbank on the north, Santa Monica Boulevard in the City of West Hollywood and the community of Hollywood on
the south, Forest Lawn Drive on the east, and Sepulveda Boulevard in the community of Sherman Oaks on the west. The Draft EIR analyzed conditions at 10 intersections along the Lankershim Boulevard corridor, including the intersection of Valleyheart Drive/James Stewart Avenue/Lankershim Boulevard. The analysis concluded that with funded improvements, Project impacts at this location, which is the only access point into the Island area, would be less than significant.

Further, as noted in Section IV.B.1.3.d.(5) of the Draft EIR, it was determined in conjunction with Los Angeles Department of Transportation that no parallel routes to the arterial street system exist through the Island neighborhood. This is consistent with the commenter’s observation that there is only one point of ingress and egress from the Island neighborhood. Therefore, the Project is not expected to result in a significant neighborhood impact on the Island neighborhood. The commenter is also referred to Topical Response No, 7: Neighborhood Intrusion (see Section III.C, Topical Responses, of this Final EIR).

Comment No. 12-143

| 45 | 2(A)(1)(i) | Delays from additional construction traffic and/or construction activities at other locations are not expected to cause substantial inconvenience to auto travelers, but would be noticeable to commuters who regularly use the streets adjacent to the Project Site. | Please define “substantial inconvenience to auto travelers.” |

Response to Comment No. 12-143

In the context presented in the comment, “substantial inconvenience” refers to a potential significant construction impact. As concluded in Response to Comment No. 12-142, with the incorporation of the identified project design features and mitigation measures, construction traffic impacts would be less than significant.

Comment No. 12-144

| 45 | 2(A)(1)(i) | During Project construction some temporary sidewalk closures at limited locations | Construction activities might increase the use of the Metro system and add additional |
may also occur. Notwithstanding, pedestrian activity around the Lankershim Boulevard and Universal Hollywood Drive/Universal Terrace Parkway intersection would be maintained throughout the construction of the Project. Sidewalk closures are concluded to constitute a less than significant impact due to the temporary nature of the impact as well as the impact occurring at only limited locations. pedestrian traffic in this area. Additionally, the Project’s program of encouraging offsite construction parking and use of mass transit will increase pedestrian traffic during construction and more so on a permanent basis. A tunnel was planned to go under Lankershim to accommodate safe pedestrian access to the Metro Red Line as part of the Red Line Construction and Metro Universal Project. A pedestrian overpass or tunnel should be part of the mitigation required for the Universal Evolution project.

Response to Comment No. 12-144

Regarding the responsibility of the referenced pedestrian bridge or tunnel, the commenter is referred to page 652 of the Draft EIR, Section IV.B.1, Traffic/Access – Traffic/Circulation. The mitigation program for the original Universal City Metro Red Line Station construction by Metro included a pedestrian tunnel beneath Lankershim Boulevard to provide a pedestrian connection between the Universal City Metro Red Line Station and the east side of Lankershim Boulevard. The pedestrian tunnel was never constructed. Pursuant to a settlement agreement unrelated to the Project, Metro will construct a pedestrian bridge in lieu of the originally proposed tunnel, and in June 2012 the Metro Board of Directors authorized the full budget to design and construct the bridge. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

With regard to the increased pedestrian activity during construction, as described in Mitigation Measure B-44 (Mitigation Measure B-41 in the Draft EIR) and in Chapter VII of the Transportation Study, the Project Applicant or its successors will prepare detailed construction traffic management plans, including street closure information, detour plans, haul routes, and staging plans satisfactory to the affected jurisdictions. The construction traffic management plans shall be based on the nature and timing of the specific construction and other projects in the vicinity of the Project Site and include numerous
elements to ensure minimum impact on the street system and the surrounding community. It should also be noted that construction impacts are temporary impacts.

Proposed crosswalk widths at the Lankershim Boulevard and Campo de Cahuenga Way intersection are 20 feet in width across the south side of the intersection and 15 feet in width at all other locations. The crosswalk area and signal time allow for the volume of pedestrian traffic at this intersection.

With regard to construction parking, the comment inaccurately states that the Project has a program of encouraging off-site construction parking. As stated on page 950 of the Draft EIR, “[d]uring construction of the Project, an adequate number of on-site parking spaces would be available at all times or the Project would provide a shuttle to an off-site parking location for construction workers.”

**Comment No. 12-145**

| 46 | 2(A)(1)(ii) | The Project is expected to generate a net total of 36,451 daily trips on a typical weekday, including approximately 3,069 morning peak hour trips and 3,623 afternoon peak hour trips before considering Transportation Demand Management/transit credits. With the incorporation of Transportation Demand Management trip reductions, the Project Site is expected to generate a net increase of 28,108 daily trips on a typical weekday, including approximately 2,328 morning peak hour trips and 2,770 afternoon peak hour trips. The Project’s Transportation Demand Management program thus reduces the Project’s trip generation by 8,343 daily trips, including | When were the traffic studies and trip generation studies completed? There have been more than 600 housing units completed in Studio City since 2007. When were the traffic counts taken? |
approximately 741 morning peak hour trips and 853 afternoon peak hour trips. The Study Area for the Project’s traffic analysis encompasses a geographic area of approximately 50 square miles, and is generally bounded by Burbank Boulevard in North Hollywood and Burbank on the north, Santa Monica Boulevard in West Hollywood and Hollywood on the south, Buena Vista Street and Forest Lawn Drive on the east, and Sepulveda Boulevard in Sherman Oaks on the west.

Response to Comment No. 12-145

The traffic study for the proposed Project was completed in 2010. As discussed on page 7 of the Draft EIR, the Notice of Preparation for the Draft EIR was issued in July 2007. Therefore, the baseline for evaluating impacts in the Draft EIR is 2007. As noted in Section IV.B.1.2.a.(2) of the Draft EIR, intersection turning movement counts for typical weekday morning (7:00 A.M. to 10:00 A.M.) and afternoon (3:00 P.M. to 6:00 P.M.) peak periods and fieldwork (intersection lane configurations, signal phasing, etc.) for the analyzed intersections were collected in Spring and Fall 2006, and Spring 2007. Traffic counts were conducted in 2003 and 2004 for three of the analyzed intersections in the City of Burbank. Traffic counts for these three intersections were provided by the City of Burbank and the City staff agreed that these counts were representative of the traffic conditions at those intersections in July 2007. It should also be noted that future traffic volumes were derived from the Universal City Transportation Model and the existing traffic volumes are used only for validation purposes. Additionally, all traffic volumes (future and existing) have been reviewed and approved by the Los Angeles Department of Transportation, LACDPW, Caltrans, and the City of Burbank. The Los Angeles Department of Transportation’s Assessment Letter is included as Appendix E-2 to the Draft EIR.
Further, as noted in Section IV.B.1.2.c.(2) of the Draft EIR, a total of 256 related projects within the 50-square-mile study area were compiled based on information provided by the City of Los Angeles, City of Burbank, and City of West Hollywood. These related projects include planned or proposed development proposals that were provided to the individual jurisdictions. As shown on Figure 52 and Table 26 in Section IV.B.1 of the Draft EIR and Figure 15 and Table 10 of the Transportation Study, traffic from these related projects has been included in all of the future traffic volume projections. The Project’s impact has been determined on future conditions that include traffic from the 256 related projects and other growth included in the Southern California Association of Government’s regional transportation model.

**Comment No. 12-146**

| 46 | 2(A)(1)(ii) | The Project is expected to generate a net total of 36,451 daily trips on a typical weekday, including approximately 3,069 morning peak hour trips and 3,623 afternoon peak hour trips before considering Transportation Demand Management/transit credits. With the incorporation of Transportation Demand Management trip reductions, the Project Site is expected to generate a net increase of 28,108 daily trips on a typical weekday, including approximately 2,328 morning peak hour trips and 2,770 afternoon peak hour trips. The Project’s Transportation Demand Management program thus reduces the Project’s trip generation by 8,343 daily trips, including approximately 741 morning peak hour trips and 853 afternoon peak hour trips. The... | When were the traffic counts taken? Additionally, the City of Burbank’s traffic study points out the TDM trip reductions are far too generous and that in fact the Metro Station requires either a bus [sic] transfer or a long walk (uphill) to reach the destination of the theme park, the residential district or the retail district and may not even qualify for Rapid Transit credits. SEE APPENDIX 1. |
Study Area for the Project’s traffic analysis encompasses a geographic area of approximately 50 square miles, and is generally bounded by Burbank Boulevard in North Hollywood and Burbank on the north, Santa Monica Boulevard in West Hollywood and Hollywood on the south, Buena Vista Street and Forest Lawn Drive on the east, and Sepulveda Boulevard in Sherman Oaks on the west.

**Response to Comment No. 12-146**

Information regarding the traffic counts collected in support of the Project’s Traffic Study is provided in Response to Comment No. 12-145.

As described in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, the Project would develop and implement a Transportation Demand Management Program. See Topical Response No. 4: Transportation Demand Management Program (see Section III.C, Topical Response, of the Final EIR), for more detail regarding the Transportation Demand Management Program.

The Transportation Demand Management credits accounted for in the Project’s trip generation assumptions under the “Future with Project with Transportation Demand Management Program” and “Future with Project with Funded Improvements” scenarios were developed in conjunction with and approved by the City of Los Angeles Department of Transportation. A detailed review of recent studies of Transit-Oriented Developments and Transportation Demand Management Programs employed at other locations in California was conducted as part of the Transportation Study. Appendix K of the Transportation Study (see Appendix E-1 of the Draft EIR) details the locations and levels of trip reductions attained by other California Transit-Oriented Development projects.

Table K-1 in Appendix K of the Transportation Study (see Appendix E-1 of the Draft EIR), provides a summary of the characteristics and trip reduction percentages achieved by various TDM Programs and a comparison to the trip reduction estimates assumed for the
Project. As shown in the table, the amount of credit assumed in the Project’s trip generation for each of the TDM strategies is lower than those achieved by other developments. Therefore, the overall 11.4 percent TDM credit assumed by the Project represents a conservative estimate of the potential effectiveness of a TDM Program for a Transit-Oriented Development located in the vicinity of a rail station. Based on the 2004 and 2006 studies of California TOD projects near rail stations, the average trip reduction is in the 19-22 percent range. Thus, the analysis presented in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR and Chapter V of the Transportation Study (see Appendix E-1 of the Draft EIR) represents a conservative approach. It should also be noted that no credits were assumed for visitors to the Theme Park.

The commenter is referred to Response to Comment No. 12-37, above, for additional information regarding monitoring of the TDM Program.

The comment references City of Burbank comments on the transportation study. With regard to City of Burbank comments, please see Comment Letter Nos. 26 and 27 and responses thereto in this Final EIR.

**Comment No. 12-147**

| 46 | P#3 | Of the 148 unsignalized intersections during the morning peak hour in 2030, before taking into account the Project’s Transportation Demand Management program and other mitigation measures, the Project is forecasted to result in **significant** impacts at 20 intersections operating at Level of Service C or Level of Service D; 13 intersections operating at Level of Service E; and 36 intersections operating at Level of Service F. During the afternoon peak hour in 2030, the Project is expected to result in **significant** impacts at 14 intersections operating at |
| Half of the 148 signalized study intersections would be significantly impacted. Does this include those located in the City of Burbank? |
III.D.1 Written Letters

| Level of Service C or Level of Service D, 12 intersections operating at Level of Service E, and 39 intersections operating at Level of Service F. |

Response to Comment No. 12-147

The intersections with a significant and unavoidable impact identified in the Draft EIR include intersections in all five jurisdictions within the Study Area, which includes the City of Burbank. The comment refers to Project traffic impacts before implementation of any project design features and mitigation measures. See Response to Comment No. 12-148 below regarding intersection Level of Service with Project improvements and mitigation measures. Also, refer to Response to Comment Nos.12-5 and 12-12 regarding alternatives that were analyzed that include less development than the proposed Project. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-148

| 46 | P#3 | Of the 148 unsignalized intersections during the morning peak hour in 2030, before taking into account the Project’s Transportation Demand Management program and other mitigation measures, the Project is forecasted to result in significant impacts at 20 intersections operating at Level of Service C or Level of Service D; 13 intersections operating at Level of Service E; and 36 intersections operating at Level of Service F. During the afternoon peak hour in 2030, the Project is expected to result in The number of intersections operating at very low levels of service (E or F) is unacceptable. The Project should be scaled back so this does not occur. |
### Response to Comment No. 12-148

The comment refers to Project traffic impacts before implementation of any project design features or mitigation measures. As described in Section IV.B.1.2.c.(7) and shown in Table 28 of the Draft EIR, approximately 48 percent of the intersections during the morning peak hour and 49 percent of the intersections during the afternoon peak hour are projected to operate at Level of Service E or F in the Future without Project conditions (year 2030) without the addition of Project traffic. Under the Future with Project with Funded Improvements conditions, approximately 39 percent of the intersections during the morning peak hour and 41 percent of the intersections during the afternoon peak hour are projected to operate at Level of Service E or F with the Project traffic and implementation of the Project’s transportation improvement and mitigation measures. Therefore, the Transportation Study indicates that at such locations the Project would improve the traffic operations within the Study Area as compared to future conditions without the Project. It should also be noted that the Project is required to mitigate only its incremental impact at the study intersections per Los Angeles Department of Transportation significance thresholds and not the future base operation levels.

The commenter is also referred to Response to Comment Nos. 12-5, 12-12, and 12-35, above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

### Comment No. 12-149

| 46 | P#3 | Of the 148 unsignalized intersections during the morning peak hour in 2030, before taking into account the Project’s Transportation Demand Management program and other mitigation | It is not acceptable that E or F LOS intersections are not improved. |
measures, the Project is forecasted to result in significant impacts at 20 intersections operating at Level of Service C or Level of Service D; 13 intersections operating at Level of Service E; and 36 intersections operating at Level of Service F. During the afternoon peak hour in 2030, the Project is expected to result in significant impacts at 14 intersections operating at Level of Service C or Level of Service D, 12 intersections operating at Level of Service E, and 39 intersections operating at Level of Service F.

**Response to Comment No. 12-149**

The commenter is referred to Response Nos. 12-5, 12-35, and 12-148, above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-150**

| 47 | P#2 | Taking into account the Transportation Demand Management trip reductions and mitigation, impacts at eight (8) of these unsignalized intersections would be reduced to a less than significant level. Therefore, Project impacts at only the Lankershim Boulevard & Jimi Hendrix Drive (Intersection 73) | This is a critical intersection and this should be signalized at the least. |
Response to Comment No. 12-150

The intersection of Lankershim Boulevard and Jimi Hendrix Drive provides access only to the Project Site. As noted in Appendix J of the Transportation Study (see Appendix E-1 of the Draft EIR), the intersection of Lankershim Boulevard & Jimi Hendrix Drive is projected to operate at Level of Service C during the morning peak hour and Level of Service D during the afternoon peak hour. Level of Service D or better is considered an acceptable LOS by the Los Angeles Department of Transportation. The Project impact at this intersection can be mitigated by the provision of a signal; however, this would not meet the Los Angeles Department of Transportation minimum spacing guidelines for closely spaced signalized intersections. It should be noted that the Project has proposed to restrict the southbound left-turn movement at this intersection from Lankershim Boulevard onto Jimi Hendrix Drive and this measure would help to improve the traffic operations at this intersection.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-151

| 47 | P #3 | In addition to analyzing all 164 signalized and unsignalized intersections per Los Angeles Department of Transportation’s methodology, intersections located in other jurisdictions (e.g., City of Burbank, City of West Hollywood, etc.) were analyzed using the methodology and significance thresholds of the jurisdiction wherein the intersection is located. | When was this analyzed? |
Response to Comment No. 12-151

The analysis for intersections within jurisdictions other than the City of Los Angeles was conducted at the same time as the traffic analysis presented in Section IV.B.1 of the Draft EIR. The results of this analysis have been provided in Appendix F of the Transportation Study (see Appendix E-1 of the Draft EIR). The commenter is referred to Response to Comment No. 12-145 for additional information regarding the timing of the traffic analysis.

Comment No. 12-152

| 48 |
|---|---|
| 258 |
| P#2 |
| P(ii) |

The Project would result in **significant** impacts to four freeway segments during the morning peak hour and seven freeway segments during the afternoon peak hour before Transportation Demand Management trip reductions and mitigation. Even with implementation of the identified mitigation measures, **significant** impacts would remain at six freeway segments.

On page 258, Freeway Segments 4, 5 &10 all significantly impact Studio City and should be mitigated to less than **significant**. The Project should not result in any **significant** impacts on any freeway segments. Such freeway segments are already too congested and impacted.

Response to Comment No. 12-152

As mentioned in Response to Comment No. 12-5, the Project has worked with the Los Angeles Department of Transportation to reduce its significant impacts to the extent feasible. Remaining significant and unavoidable impacts have been disclosed in the Draft EIR. The commenter is referred to Response to Comment No. 12-5, above, regarding significant and unavoidable impacts. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.


**Comment No. 12-153**

<table>
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<tr>
<th>48</th>
<th>P#4</th>
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<tr>
<td>Based on the Project’s traffic analysis, nine neighborhoods were identified that may be subject to neighborhood traffic intrusion impacts. After Transportation Demand Management trip reductions and sub-regional and regional highway improvements, five neighborhoods have the potential to experience neighborhood intrusion impacts. With implementation of the Project’s proposed mitigation, the Project’s potential significant neighborhood impact could remain significant and no other feasible mitigation was identified.</td>
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<tr>
<td>No neighborhood in Studio City is identified as an impacted neighborhood; however the Island Neighborhood west of Lankershim and the hillside community south of Ventura and west of Lankershim and the Ventura corridor including Radford, Laurel Canyon and Whitsett are all impacted.</td>
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**Response to Comment No. 12-153**

Potential neighborhood intrusion impacts were evaluated in the Transportation Study (see Appendix E-1 of the Draft EIR) and discussed in Sections IV.B.1.3.d(5) and IV.B.1.5.g of the Draft EIR. The methodology used in this analysis is consistent with Los Angeles Department of Transportation Guidelines, which identifies those residential neighborhoods that might be significantly impacted by Project traffic according to Los Angeles Department of Transportation criteria for “cut-through” traffic on neighborhood streets.

The commenter is referred to Response to Comment No. 12-142 above regarding neighborhood intrusion impacts.

**Response to Comment No. 12-154**

As explained on pages 418-419 in Section IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft EIR, the northeastern portion of the Project Site that abuts the Los Angeles River Flood Control Channel is within the jurisdiction of the City of Los Angeles.
Angeles. The remaining approximately three-fourths of the northern edge of the Project Site is adjacent to River Road, a two-lane roadway that runs along the Los Angeles River Flood Control Channel. The majority of this northern edge is in the jurisdiction of the County and the majority of the River Road roadway is owned by the Los Angeles County Flood Control District.

The Project does not preclude a bike path along the Los Angeles River Flood Control Channel. As stated above, the majority of the land adjacent to the Los Angeles River Flood Control Channel is owned by the County. As stated in Section IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft EIR, the Project Site is located in Reaches 4 and 5 of the Los Angeles County River Master Plan. Improvements identified in the Plan include tree plantings, a trail adjacent to the Los Angeles River Flood Control Channel and a pedestrian/bicycle path connection to Universal CityWalk. As stated in Section IV.A.1, Land Use-Land Use Plans/Zoning of the Draft EIR, the Applicant will cooperate with the County, City and other agencies as necessary to accommodate the future use of the County land for public use as contemplated by the County River Master Plan and to continue use, if allowed by the County, of a portion of River Road for studio access. In addition, the Project includes the pedestrian/bicycle connection through the Project Site to CityWalk, as contemplated by the County River Master Plan. This internal circulation is not proposed as a substitute for the trail along the river. Further, in the northeastern portion of the Project Site that is within the City’s jurisdiction and owned by the Applicant, the Project proposes a River Trailhead Park that would provide access to the river area, and connect the existing bike path along Forest Lawn Drive and the proposed bike path along the proposed North-South Road. If the County implements a public trail on the County-owned portion of the Los Angeles River Flood Control Channel frontage, that path could be connected to the proposed River Trailhead Park and the internal bike path along the North-South Road.

Regarding the East-West Road, the commenter is referred to Response to Comment No. 12-61, above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-155

<table>
<thead>
<tr>
<th>49</th>
<th>P #49</th>
<th>Supplemental Caltrans Analysis</th>
<th>The Project should not move forward without the needed freeway improvements. Whether the freeway improvements are funded by the Project or CalTrans [sic],</th>
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<tr>
<td></td>
<td>Table 41</td>
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<td>Items 5,6</td>
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<td></td>
<td>Table 42</td>
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Items 5, 6

the freeway improvements are needed before the project is built and occupied.

Response to Comment No. 12-155

The Project would be required to implement the freeway and street improvements required as part of the Projects’ approvals. The commenter is referred to Response to Comment No. 12-47 regarding transportation improvements and Topical Response No. 6: Freeway Improvement (see Section III.C, Topical Responses, of this Final EIR).

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-156

49  P #2

Under the Project, a number of entry points to the Project Site would be available. All new on-site driveway locations from City streets would be required to conform with City standards and would be required to provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls that meet the City’s requirements to protect pedestrian safety. Signalization meeting City standards would be provided at the Project access locations requiring signalization to provide for proper vehicular and bicycle movement controls. Thus, the Project would not substantially increase hazards to pedestrians, bicyclists, or vehicles and a less than

There is significant shuttle, bicycle, pedestrian and vehicular traffic all concentrated at the Metro station. There should be greater safety measures taken for bicycle and pedestrian traffic including a tunnel or overpass.
Response to Comment No. 12-156

The Universal City Metro Red Line Station is not a part of the Project or Project Site. Proposed crosswalk widths at the Lankershim Boulevard and Campo de Cahuenga Way intersection are 20 feet in width across the south side of the intersection and 15 feet in width at all other locations. The crosswalk area and signal time allow for the anticipated volume of pedestrian traffic at this intersection. As such, the Project would not substantially increase hazards to pedestrians, bicyclists or vehicles and less than significant impacts would occur. The commenter is also referred to Response to Comment No. 12-144, above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-157

| 52 | P #2 | Neighborhood Intrusion | Significant and unavoidable neighborhood intrusion in the Studio City Island Neighborhood and areas south of Ventura Blvd and west to Colfax Avenue are unacceptable. |

Response to Comment No. 12-157

Potential neighborhood intrusion impacts were evaluated in the Transportation Study (see Appendix E-1 of the Draft EIR) and discussed in Sections IV.B.1.3.d(5) and IV.B.1.5.g of the Draft EIR.

The commenter is referred to Response to Comment No. 12-142 above and Topical Response No. 7: Neighborhood Intrusion (see Section III.C, Topical Responses, of this Final EIR) for additional information regarding neighborhood intrusion.

Comment No. 12-158

| 53 | P #2 | (4) Project Design Features and Mitigation Measures | All mitigation measures shall be guaranteed by NBC Universal |
III.D.1 Written Letters

and/or its parent company and all successor owners. The must alleviate the **significant** cumulative impacts at the analyzed freeway segments.

<table>
<thead>
<tr>
<th>Response to Comment No. 12-158</th>
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<tbody>
<tr>
<td>Regarding responsibility for and implementation of the mitigation measures, the commenter is referred to Response to Comment No. 12-16, above. Regarding impacts on the freeway system, the commenter is referred to Response to Comment Nos. 12-5 and 12-152, above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.</td>
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<th>Comment No. 12-159</th>
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<tr>
<td>54 P #1 If any of the traffic mitigation measures within the City of Los Angeles or any other jurisdiction are determined to be infeasible or necessary permits/approvals to implement the mitigation measures cannot be obtained, then a <strong>significant</strong> impact (or impacts) may remain.</td>
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<tr>
<th>Response to Comment No. 12-159</th>
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<tr>
<td>With regard to significant and unavoidable impacts, the commenter is referred to Response to Comment No. 12-5, above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.</td>
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<th>Comment No. 12-160</th>
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<tr>
<td>54 2 All traffic mitigation measure improvements within the responsibility and jurisdiction</td>
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of public agencies other than the City of Los Angeles shall be monitored through the Los Angeles Department of Transportation and implemented to the extent feasible. If improvements within the responsibility and jurisdiction of public agencies other than the City of Los Angeles (i.e., City of Burbank, City of West Hollywood, Caltrans, etc.) cannot be implemented, significant traffic impacts may remain at such locations.

of all traffic mitigation measures including all CalTrans [sic] improvements within the Cahuenga Pass from Highland to Vineland and all other mitigations.

Response to Comment No. 12-160

The Draft EIR discusses traffic mitigation phasing starting on page 687 of Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR. With regard to the implementation of the mitigation measures related to construction of the residential development, the City of Los Angeles Department of Transportation’s assessment letter dated April 2, 2010 (see Appendix E-2 of the Draft EIR), states the following:

“[d] Prior to the issuance of any building permit for each sub-phase, all on- and off-site mitigation measures for the sub-phase shall be complete or suitably guaranteed to the satisfaction of LADOT.”

and

“[g] Prior to the issuance of any temporary or permanent Certificate of Occupancy in the final sub-phase, all required improvements in the entire mitigation phasing plan shall be funded, completed, or resolved to the satisfaction of LADOT."

The commenter is referred to Response to Comment Nos. 12-16 and 12-155.

As noted in Response to Comment No. 12-47, above, other regional US 101 corridor improvements between Vineland Avenue and Highland Avenue are not Project mitigation measures; therefore, development of the Project is not contingent on the implementation of
those improvements. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-161**

| 55 | Project Design Feature B-2 | North/South Road | The inclusion of the north/south road accommodates the housing and circulation within the project; however it does not provide regional benefit. The east/west road along the river must be included as project mitigation. |

**Response to Comment No. 12-161**

The commenter is referred to Response to Comment No. 12-50 regarding the North-South Road and Response to Comment No. 12-61 above regarding the East-West Road.

**Comment No. 12-162**

| 58 | (A) Sharing of Mitigation Measures | The proposed Metro Universal project would be required to suitably guarantee the shared intersection improvements prior to building permit issuance as well as implement these improvements before issuance of a certificate of occupancy. | The sharing of the mitigation measures and credits contemplates multiple ownerships of the NBC Universal Evolution Project and the Metro Universal Project. The obligations for mitigation must be joint and several with NBC Universal and/or its parent company backstopping the cost for the improvements. NBC Universal shall guarantee improvements adjacent to the Metro Universal Project and mitigations shall not be shared. |
Response to Comment No. 12-162

As explained in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR and Appendix A of the Transportation Study (see Appendix E-1 of the Draft EIR), pursuant to standard City of Los Angeles Department of Transportation policies and procedures, the traffic analysis included traffic generated by related projects, including the proposed Metro Universal project, which is no longer proposed. The traffic analysis did not, however, include the proposed Metro Universal project traffic mitigations as future base roadway improvements, since the proposed Metro Universal project was not an entitled, approved development. As noted in Section IV.B.1.5.c of the Draft EIR, the Project’s mitigation program does include certain improvement measures that can be shared with other projects such as the Metro Universal project. At such locations, the Project’s traffic impact analysis accounts for only the excess mitigation credit available at those locations. The commenter is referred to Topical Response No. 3: Defining the Proposed Project (see Section III.C, Topical Responses, of this Final EIR), regarding the Metro Universal project. The commenter is also referred to Response to Comment No. 12-14.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-163

| 59 | Mitigation Measure B-1 | The Project Applicant or its successor shall implement the following:
|    | □ Provide one articulated bus to be operated by Metro to supplement the Metro Rapid 750 service (capacity = 66 seated of 75 standing); and |
|    | □ Pay the net operations and maintenance (O&M) costs for the new bus during peak hours (7:00 A.M. to 10:00 A.M. and 3:00 P.M. to 6:00 P.M.) for the first three years of the bus’s operation and shall pay for the unsubsidized portion of these costs for an additional seven years of the bus’s operation. |
|    | How do we know that one bus is sufficient? When and how was the study done? |
|    | The Project should consider an assessment district on all portions of the Project to pay for ongoing bus mitigation for more than 5 years. |
|    | The Ventura/Cahuenga Boulevard Corridor Specific Plan prohibits increased LOS at intersections and added traffic on Ventura and Cahuenga. |
Firebox revenues and state/federal transit subsidies shall be credited against operation and maintenance costs for years 1 through 10 of the bus' operation.

Response to Comment No. 12-163

The analysis for the regional transit system presented in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR was conducted based on standard City of Los Angeles Department of Transportation procedures (see Appendix E-1 of the Draft EIR). As discussed on page 632 of the Draft EIR, and shown in Table 35 on page 798 of the Draft EIR, the Project is estimated to generate approximately 1,681 daily transit trips, including 1,037 morning peak-hour transit trips and 1,194 afternoon peak-hour transit trips. Approximately 30 buses operate in the vicinity of the Project Site. Based on the average load factors in the morning and afternoon peak hours in the Project vicinity, it was determined that there is residual capacity on the existing transit system on all lines serving the Project Site except Metro Rapid 750. In conjunction with the City of Los Angeles Department of Transportation and Metro, it was determined that one additional articulated bus during the peak hours along the Metro Rapid 750 route would mitigate impacts to the transit system. As part of Mitigation Measure B-1, the Applicant is required to provide one articulated bus to be operated by Metro to supplement the Metro Rapid 750 service and to pay the net operations and maintenance (O&M) costs for the new bus during peak hours (7:00 A.M. to 10:00 A.M. and 3:00 P.M. to 6:00 P.M.) for the first three years of the bus’s operation and pay for the unsubsidized portion of these costs for an additional seven years of the bus’s operation. Farebox revenues and state/federal transit subsidies shall be credited against operation and maintenance costs for years 1 through 10 of the bus' operation. The Los Angeles Department of Transportation determined that the mitigation addresses the impact.

With regard to the Ventura-Cahuenga Boulevard Corridor Specific Plan, it appears that the comment refers to Section 6, item E, Project Limitations Based on Traffic Impact, of that Specific Plan. Section 6.E states:

"When 4,110,000 square feet of additional Commercial Floor Area have been permitted in the entire Specific Plan area during Phase 1 and 12 of the intersections listed in Subsection F below are operating at the unacceptable Level of Service of E or F, as determined by the Department of
Transportation, then each Project shall be limited to the Basic Development Rights as set forth in Subsection A of Section 6.”

The proposed Project square footage development is located adjacent to but not within the Ventura–Cahuenga Boulevard Corridor Specific Plan area, and is not subject to this limitation. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-164

| 60 | Mitigation Measure B-2 | The shuttle system shall be guaranteed for 20 years. The final shuttle routes shall be subject to LADOT approval. The shuttle systems, routes, stops, headways, and hours of operation shall be reviewed periodically and may be modified with LADOT approval. | The Project should consider an assessment district on all portions of the Project to pay for ongoing bus mitigation for more than 5 years. |

Response to Comment No. 12-164

As stated in Mitigation Measure B-2, the shuttle system shall be guaranteed by the Applicant for 20 years. Regarding bus mitigation, the commenter is referred to Response to Comment No. 12-163, above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-165

| 61 | Mitigation Measure B-4 | The Project Applicant or its successor shall construct or contribute to… | Project Applicant or its successor shall construction [sic] and not just contribute to. |

Response to Comment No. 12-165

The term “implement or contribute to” is used because certain mitigations could be shared with another project and the Applicant may either implement the improvement or, if the improvement is first implemented by the other project, the Applicant may provide
reimbursement for a portion of the costs of the improvement. The sharing of traffic mitigation measures is discussed in more detail in Section IV.B.1.5.c of the Draft EIR.

**Comment No. 12-166**

| 61 | Mitigation Measure B-4 a. | Relocation of the existing Hollywood Freeway southbound onramp east of Fruitland Drive at Ventura Boulevard to the intersection of Fruitland Drive and Ventura Boulevard; | Eliminate neighborhood intrusion and pass through traffic to neighborhoods south of Ventura from Lankershim to Vineland. |

**Response to Comment No. 12-166**

Based on the Universal City Transportation Model, it is not anticipated that the proposed Hollywood Freeway Interchange Improvements at Universal Terrace Parkway (Mitigation Measure B-4) would increase neighborhood intrusion impacts along Fruitland Drive or Wrightwood Drive as suggested in the comment. The proposed design of the improvement reflected in Figure 77 on Page 909 of the Draft EIR and signalization of the intersection, including proposed left turn signals, would improve traffic flow through the intersection and are intended to direct traffic onto Ventura Boulevard.

**Comment No. 12-167**

| 61 | Mitigation B-4 b. | Construction of a new southbound off-ramp to Ventura Boulevard connecting to Ventura Boulevard at its intersection with the above relocated Hollywood Freeway southbound onramp at Fruitland Drive; | This dumps traffic on to Ventura/Cahuenga Blvd. which is prohibited pursuant to the Ventura/Cahuenga Blvd. Corridor Specific Plan. |

**Response to Comment No. 12-167**

With regard to the Ventura/Cahuenga Boulevard Corridor Specific Plan, the commenter is referred to Response to Comment No. 12-163, above. With regard to traffic on Ventura and Cahuenga Boulevard, the commenter is referred to Response to Comment No. 12-167.
No. 12-166 above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-168**

| 61 | Mitigation B-5 | The Project Applicant or its successor shall widen and restripe Barham Boulevard from Forest Lawn Drive/Lakeside Plaza Drive to provide three continuous southbound lanes, two northbound lanes, and left-turn pockets to minor streets throughout the length of the roadway section from Forest Lawn/Lakeside Plaza Drive in the north to Buddy Holly Drive/Cahuenga Blvd (East) in the South. | All the traffic coming south will bottleneck at the Barham bridge over US101. The proposal to widen Barham is inadequate and not feasible. How will the widening be accomplished and who will pay for it? |

**Response to Comment No. 12-168**

As noted in Response to Comment No. 12-47, above, as required by the Los Angeles Department of Transportation, the Project would implement all of the project design features and mitigation measures required as part of the Project’s approvals. The proposed Project mitigation for Barham Boulevard as described in Mitigation Measure B-5 in Section IV.B.1 of the Draft EIR (third southbound through lane at this location) has been reviewed and approved by the Los Angeles Department of Transportation and mitigates the Project’s impacts while alleviating traffic congestion along the corridor. The separate right-turn lane approaching the intersection at Forest Lawn Drive referenced in the comment would be maintained and extended south to Child Care Road, which would improve the existing condition. In addition, the Project’s proposed improvements include the re-stripping of Forest Lawn Drive to allow the right turn from Barham Boulevard to be a free-flow right-turn lane (i.e., vehicles turning right onto Forest Lawn Drive from Barham Boulevard would have their own dedicated receiving lane to turn into on Forest Lawn Drive without having to stop).

Impacts associated with implementation of Mitigation Measure B-5 are analyzed beginning on page 715 of the Draft EIR under Level 3 Off-Site Roadway Improvements.
These Barham Boulevard improvements would be constructed within the existing public right-of-way with additional dedication of Project Site property where available adjacent to the Project Site and also by reducing existing lane widths, eliminating parking spaces, and reducing sidewalk widths to varying degrees along the Barham Boulevard corridor. As discussed on page 717, Section IV.B.1.6.i.(3)(c) of the Draft EIR, along the Barham Boulevard corridor, proposed roadway improvements would require reducing the existing sidewalks adjacent to the west side of Barham Boulevard in three distinct segments (i.e., reduced from 11 feet to 10 feet between Blair Drive and the Barham Boulevard Bridge, reduced in varying amounts to between 6 feet and 10 feet between Blair Drive and Craig Drive, and reduced from 8 feet to 6 feet north of Lakeside Plaza Drive).

While sidewalk widths may be reduced to 6 feet in some areas, sidewalks are not being eliminated along Barham Boulevard and the Project would add sidewalks in certain areas. In addition, the proposed landscaping improvements on Barham Boulevard included in Mitigation Measure B-4 in Section IV.B.1 of the Draft EIR would generally enhance the pedestrian experience along the corridor.

As proposed, the mitigation measure would not widen the east side of Barham Boulevard. Therefore, public and vehicular access on the east side would be unchanged with the proposed mitigation measure. The west side of Barham Boulevard would be widened 5 feet. The existing landscape strip and 5-foot wide sidewalk would be replaced with a 6-foot sidewalk, and pedestrian and vehicular access would be maintained.

As noted above, the proposed improvement to Barham Boulevard has been reviewed and approved by the Los Angeles Department of Transportation and mitigates the Project’s impacts while alleviating traffic congestion along the corridor.

**Comment No. 12-169**

<table>
<thead>
<tr>
<th>64</th>
<th>Mitigation B-8</th>
<th>Vineland Avenue &amp; Moorpark Street (Intersection 11):</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>The Project Applicant or its successor shall implement or contribute to the implementation of a southbound right-turn lane so that the Vineland Avenue southbound approach would have a left-turn lane, three through lanes, and a right-turn lane. In order to enhance</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Increasing the traffic capacity of this intersection will increase the traffic along Moorpark westbound all the way past Laurel Canyon. Moorpark is one lane in most areas. The signals between Vineland and Laurel Canyon are old and cannot be synchronized. These signals must be upgraded as part of the mitigation to avoid severe traffic (especially in front of Oakwood</td>
</tr>
</tbody>
</table>
safety by improving visibility, the improvement also includes removal of the raised medians on the north and south legs of the intersection to better align the northbound and southbound left-turn pockets. School) due to the restructuring of the southbound 101 off ramp on Tujunga a few blocks away dumping traffic onto Tujunga that will end up on Moorpark turning left to go towards Vineland in the area. Moorpark should be widened East/West Tujunga to Cahuenga.

Response to Comment No. 12-169

The comment incorrectly states that the mitigation measure (Mitigation Measure B-8 in Section IV.B.1 of the Draft EIR) proposed for the intersection of Vineland Avenue & Moorpark Street would increase traffic on Moorpark Street. The proposed mitigation measure is a southbound right-turn lane on Vineland Avenue that is proposed to accommodate the traffic demand at this intersection and improve the flow along the Vineland Avenue corridor.

In addition, the Project’s transportation improvement and mitigation program does include signal upgrades on the stretch of Moorpark Street noted in the comment. As stated on pages 687 and 688 of the Draft EIR, the Project includes a signal controller upgrade at the intersection of Colfax Avenue & Moorpark Street and closed-circuit television cameras on Laurel Canyon Boulevard & US 101 northbound ramps and Laurel Canyon Boulevard & US 101 southbound ramps. These improvement measures fully mitigate the Project’s impact on Moorpark Street.

Comment No. 12-170

| 65 | Mitigation B-13 | Cahuenga Boulevard & Moorpark Street (Intersection 30): The Project Applicant or its successor shall implement or contribute to the implementation of a northbound right-turn lane so that the Cahuenga Boulevard northbound approach would According to the DEIR and in the Traffic Mitigation plans, Cahuenga is a major feeder street into the Project area. If there is a plan to downgrade Cahuenga from Secondary Highway standards to a Collector Street, how can that allow for Cahuenga (as a collector street) to function as a major feeder street for the |
have a left-turn lane, two through lanes, and a right-turn lane. However, this proposed physical mitigation is in conflict with a recent plan adopted for Cahuenga Boulevard that proposes to downgrade Cahuenga Boulevard from Secondary Highway standards to Collector Street standards. Therefore, per the Los Angeles Department of Transportation direction, this analysis conservatively assumes that the proposed physical improvement would not be implemented.

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**Response to Comment No. 12-170**

The comment incorrectly states that the traffic analysis assumes that Cahuenga Boulevard is a major feeder street to the Project Site. As shown in Figure 61 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, the Universal City Transportation Model assigns only 2 percent of the traffic to Cahuenga Boulevard north of the SR 134 freeway. In addition, as noted in Mitigation Measure B-13 described on page 672 of the Draft EIR, the transportation analysis acknowledges that a recent plan adopted for Cahuenga Boulevard proposes to downgrade Cahuenga Boulevard from Secondary Highway Standards to Collector Street Standards. Therefore, the transportation analysis assumes that the proposed physical improvement at Cahuenga Boulevard and Moorpark Street would not be implemented. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-171**

| Mitigation B-18 | Barham Boulevard and Cahuenga Boulevard (Intersection 47): The Project Applicant or its successor | Barham and Cahuenga Boulevards are already at a stand still [sic] during much of the day. If this improvement |
shall implement or contribute to the widening of the Cahuenga Boulevard westbound approach to provide an additional through lane to match the existing westbound departure. This improvement requires use of Caltrans right-of-way. If this right-of-way is not available, a significant impact would remain at this intersection in the afternoon peak hour. The Project’s impact at this intersection in the morning peak hour is fully mitigated by the local shuttle from Lakeside Plaza Drive to Hollywood.

needs the use of CalTrans [sic] right-of-way and there is a possibility that the right-of-way is not granted, then that issue needs to be resolved prior to the start of construction of the Project. If the right-of-way is not granted, other options must be implemented to avoid a significant impact at this intersection.

Barham cannot be widened.

Response to Comment No. 12-171

The proposed mitigation measure for the intersection of Barham Boulevard & Cahuenga Boulevard (Mitigation Measure B-18 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR) has been reviewed and approved by the Los Angeles Department of Transportation. As noted in Section IV.B.1.5.a of the Draft EIR, the Project Applicant or its successors shall work with the governing jurisdictions to ensure the implementation of the proposed mitigation measures. However, in the event that permits or approvals are not obtained, significant impacts may remain. Therefore, the Draft EIR has disclosed this possibility for the review and consideration of the decision-makers.

With regard to significant and unavoidable impacts, the commenter is referred to Response to Comment No. 12-5, above. Regarding the Barham mitigation measures, the commenter is referred to Response to Comment No. 12-168, above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-172

| 66 | Mitigation B-19 | Barham Boulevard and Buddy Holly Drive/Cahuenga | This mitigation facilitates many more cars at the intersection of |
### Response to Comment No. 12-172

The proposed mitigation measure for the intersection of Barham Boulevard & Buddy Holly Drive/Cahuenga Boulevard (Mitigation Measure B-19 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR) has been reviewed and approved by the Los Angeles Department of Transportation. In addition, the Project has proposed a mitigation measure for the intersection of Barham Boulevard & Cahuenga Boulevard (Mitigation Measure B-18 in Section IV.B.1 of the Draft EIR) that would help in alleviating traffic congestion on the Barham Boulevard bridge. As shown in Table 39 in Section IV.B.1 of the Draft EIR, the Project’s impact at both intersections is mitigated to a less than significant level with these mitigation measures. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

### Comment No. 12-173

<table>
<thead>
<tr>
<th>Mitigation B-22</th>
<th>Ventura Freeway eastbound on-ramp &amp; Riverside Drive (Intersection 15): The Project Applicant or its successor shall: (1) implement or contribute to the implementation of signalization of the intersection with protected left-turn phasing for the eastbound approach; (2) (1) The applicant shall implement the required mitigation. (2) The applicant shall implement the required mitigation. (3) Applicant shall implement mitigation if mitigation is found to be necessary and</th>
<th>Barham and Cahuenga at the existing bottleneck of the Barham Bridge crossing the 101 freeway from Cahuenga East to Cahuenga West without solving the problem of upgrading or expanding the bridge which is necessary to carry the increased traffic that will cross it.</th>
</tr>
</thead>
</table>
implement or contribute to the implementation of restriping the west leg of the intersection to provide an additional eastbound left-turn lane so that the Riverside Drive eastbound approach has dual left-turn lanes and two through lanes; and (3) install or contribute to the implementation of a crosswalk on the east leg of the intersection. It should be noted that the satisfaction of a traffic signal warrant shall not in itself require the installation of a signal. The decision on whether a traffic signal should be installed will be made by the City of Los Angeles Department of Transportation and Caltrans at the time of the proposed improvement taking into consideration other factors such as spacing with adjacent signalized intersections and interruption to traffic flow along the major street. Depending on the spacing of adjacent signalized intersections and the traffic flow, it may not be feasible to install a signal at the unsignalized intersection.

crosswalk should have pedestrian strobe lighting in the street.

Response to Comment No. 12-173

As noted in Response to Comment No. 12-47, above, as required by the Los Angeles Department of Transportation, the Project would implement all of the project
design features and mitigation measures required as part of the Project’s approvals. Refer to Response to Comment No. 12-165 regarding the wording of the mitigation measures.

With regard to pedestrian strobe lights, the Los Angeles Department of Transportation no longer utilizes pedestrian strobe lights embedded in the road; instead, the Department’s preference is to install pedestrian activated signalized crosswalk (i.e., a signal that is generally green for the motor vehicles unless a pedestrian pushes the button on the signal in which case it changes to flashing red to allow the pedestrian to cross).

See also Response to Comment No. 12-171, above, regarding review by other jurisdictions such as Caltrans. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-174**

| 67 | Mitigation B-23 | Cahuenga Boulevard & Ventura Freeway eastbound ramps (Intersection 28): The Project Applicant or its successor shall widen or contribute to the widening of the Ventura Freeway eastbound off-ramp to provide a 14-foot wide left-turn lane, a 12-foot wide shared left/right-turn lane, and one 14-foot right-turn lane. | Applicant shall implement mitigation. |

**Response to Comment No. 12-174**

As noted in Response to Comment No. 12-47, above, as required by the Los Angeles Department of Transportation, the Project would implement all of the project design features and mitigation measures required as part of the Project’s approvals. Refer to Response to Comment No. 12-165 regarding the wording of the mitigation measures. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment No. 12-175

| 67 | Mitigation B-24 | Cahuenga Boulevard & Hollywood Freeway northbound off-ramp (Intersection 68): The Project Applicant or its successor shall: (1) widen or contribute to the widening of the Hollywood Freeway northbound off-ramp to provide an additional right-turn lane, and (2) relocate or contribute to the relocation of the crosswalk on Cahuenga Boulevard from the north leg of the intersection to the south leg. | Applicant shall implement mitigation. Crosswalk should have pedestrian strobe lights in the street. |

Response to Comment No. 12-175

As noted in Response to Comment No. 12-47, above, as required by the Los Angeles Department of Transportation, the Project would implement all of the project design features and mitigation measures required as part of the Project’s approvals. Refer to Response to Comment No. 12-165 regarding the wording of the mitigation measures. With regard to pedestrian strobe lights, refer to Response to Comment No. 12-173.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-176

| 67 | Mitigation B-25 | Tujunga Avenue and Hollywood Freeway southbound off-ramp (Intersection 157): The Project Applicant or its successor shall signalize the intersection with permitted left-turn phasing for the southbound | This mitigation is one block north of the intersection Tujunga Ave and Moorpark St. in Studio City. The signals on Moorpark from Laurel Canyon to Cahuenga and on Tujunga from the off ramp to Ventura Blvd are old and do not allow |
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approach. It should be noted that the satisfaction of a traffic signal warrant shall not in itself require the installation of a signal. The decision on whether a traffic signal should be installed will be made by the City of Los Angeles Department of Transportation and Caltrans at the time of the proposed improvement taking into consideration other factors such as spacing with adjacent signalized intersections and interruption to traffic flow along the major street. Depending on the spacing of adjacent signalized intersections and the traffic flow, it may not be feasible to install a signal at the unsignalized intersection.

for phasing. Additionally, the southbound approach on Tujunga to Moorpark is one thru lane and a right turn lane with no left turn signal. Any mitigation improvement of the off ramp must include signal upgrading along Moorpark and Tujunga [sic]. If a signal is put in at the off ramp, the cross walk should have strobe lights for pedestrian protection.

Response to Comment No. 12-176

As shown in Table 40 in Section IV.B.1 of the Draft EIR, the proposed mitigation measure (Mitigation Measure B-25 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR) mitigates the Project’s impact at the intersection of Tujunga Avenue & US 101 southbound off-ramp to a level below significance. In addition, the Project would implement signal controller upgrades on Moorpark Street (at Colfax Avenue, Lankershim Boulevard, and Cahuenga Boulevard) and closed-circuit television cameras on Laurel Canyon Boulevard & US 101 northbound ramps and Laurel Canyon Boulevard & US 101 southbound ramps. These improvement measures mitigate the Project’s impact on Moorpark Street.

With regard to pedestrian strobe lights, refer to Response to Comment No. 12-173. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
### Comment No. 12-177

<table>
<thead>
<tr>
<th>No.</th>
<th>Mitigation</th>
<th>Description</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>68</td>
<td>B-26</td>
<td>Cahuenga Boulevard &amp; Hollywood Freeway southbound ramps [sic] (Intersection 162): The Project Applicant or its successor shall install or contribute to the signalization of the intersection with permitted left-turn phasing for the southbound approach. It should be noted that the satisfaction of a traffic signal warrant shall not in itself require the installation of a signal. The decision on whether a traffic signal should be installed will be made by the City of Los Angeles Department of Transportation and Caltrans at the time of the proposed improvement taking into consideration other factors such as spacing with adjacent signalized intersections and interruption to traffic flow along the major street. Depending on the spacing of adjacent signalized intersections and the traffic flow, it may not be feasible to install a signal at the unsignalized intersection.</td>
<td>Project applicant shall be responsible for implementation of mitigation.</td>
</tr>
</tbody>
</table>

### Response to Comment No. 12-177

As noted in Response to Comment No. 12-47, above, as required by the Los Angeles Department of Transportation, the Project would implement all of the project...
design features and mitigation measures required as part of the Project’s approvals. Refer to Response to Comment No. 12-165 regarding the wording of the mitigation measures and Response to Comment No. 12-171 regarding the implementation of mitigation measures located in jurisdictions other than the City of Los Angeles. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-178**

| 68 | Mitigation B-27 | Pass Avenue & Verdugo Lane (Intersection 75): The Project Applicant or its successor shall provide or contribute to the implementation of additional signal equipment to connect the intersection to the City of Burbank’s Traffic Signal Interconnect & Signal Timing System and Citywide Signal Control System. | Project applicant shall be responsible for implementation of mitigation. |

**Response to Comment No. 12-178**

As noted in Response to Comment No. 12-47, above, as required by the Los Angeles Department of Transportation, the Project would implement all of the project design features and mitigation measures required as part of the Project’s approvals. Refer to Response to Comment No. 12-165 regarding the wording of the mitigation measures and Response to Comment No. 12-171 regarding the implementation of mitigation measures located in jurisdictions other than the City of Los Angeles. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-179**

| 68 | Mitigation B-28 | Evergreen Street/Riverside Drive & Alameda Avenue (Intersection 77): The Project Applicant or its successor shall provide or contribute to the provision of additional | Project applicant shall be responsible for implementation of mitigation. |
signal equipment to connect the intersection to the City of Burbank’s Citywide Signal Control System. Additional mitigation in response to the Burbank Analysis is as follows. The Project Applicant or its successor shall implement or contribute to the implementation of a widening of the Riverside Drive eastbound approach to provide dual right-turn lanes.

**Response to Comment No. 12-179**

As noted in Response to Comment No. 12-47 above, as required by the Los Angeles Department of Transportation, the Project would implement all of the project design features and mitigation measures required as part of the Project’s approvals. Refer to Response to Comment No. 12-165 regarding the wording of the mitigation measures and Response to Comment No. 12-171 regarding the implementation of mitigation measures located in jurisdictions other than the City of Los Angeles. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-180**

| 69 | Mitigation B-29 | Pass Avenue & Ventura Freeway eastbound off-ramp (Intersection 78): The Project Applicant or its successor shall provide or contribute to the provision of additional signal equipment to connect the intersection to the City of Burbank’s Traffic Signal Interconnect & Signal Timing System and Citywide Signal Control System. | Project applicant shall be responsible for implementation of mitigation. |
Response to Comment No. 12-180

As noted in Response to Comment No. 12-47, above, as required by the Los Angeles Department of Transportation, the Project would implement all of the project design features and mitigation measures required as part of the Project’s approvals. Refer to Response to Comment No. 12-165 regarding the wording of the mitigation measures and Response to Comment No. 12-171 regarding the implementation of mitigation measures located in jurisdictions other than the City of Los Angeles. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-181

| 69 | Mitigation B-30 | Pass Avenue & Alameda Avenue (Intersection 79): The Project Applicant or its successor shall: (1) provide or contribute to the provision of additional signal equipment to connect the intersection to the City of Burbank’s Citywide Signal Control System, and (2) implement or contribute to the implementation of a westbound right-turn lane so that the Riverside Drive westbound approach would have a left-turn lane, two through lanes, and a right-turn lane. | Project applicant shall be responsible for implementation of mitigation. |

Response to Comment No. 12-181

As noted in Response to Comment No. 12-47, above, as required by the Los Angeles Department of Transportation, the Project would implement all of the project design features and mitigation measures required as part of the Project’s approvals. Refer to Response to Comment No. 12-165 regarding the wording of the mitigation measures and Response to Comment No. 12-171 regarding the implementation of mitigation
measures located in jurisdictions other than the City of Los Angeles. Please note that the mitigation measure referenced in the comment has been updated in response to comments from the City of Burbank. (See Correction and Addition No. Appendix E-1.C, Section II, of this Final EIR.) The comment is noted and will be incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-182**

| 69 | Mitigation B-30 | Additional mitigation in response to the Burbank Analysis is as follows. The Project Applicant or its successor shall: (1) implement or contribute to the implementation of restricting the northbound left turn movement from Pass Avenue onto westbound Alameda Avenue, and (2) implement or contribute to the implementation of extending the dual left-turn lanes on the Pass Avenue southbound approach at the intersection of Pass Avenue & Riverside Drive to the intersection of Pass Avenue & Alameda Avenue. | Project applicant shall be responsible for implementation of mitigation. |

**Response to Comment No. 12-182**

As shown in Appendix F of the Transportation Study (see Appendix E-1 of the Draft EIR), the Project’s impact at this intersection under the City of Burbank guidelines is mitigated to a less than significant level by the Citywide Signal Control System signal improvement alone. However, under the Los Angeles Department of Transportation guidelines, the proposed physical improvement is required to mitigate the Project’s impact at this location to less than significant.

The proposed physical improvement measure was initially developed in conjunction with the City of Burbank staff. As explained in Response to Comment No. 12-181, the
mitigation measure has been updated in response to comments from the City of Burbank (see Correction and Addition No. Appendix E-1.C, Section II, of this Final EIR). However, if the City of Burbank determines that the proposed improvement is not feasible, the Project’s impact at this location under the City of Burbank guidelines would still be mitigated with implementation of the Citywide Signal Control System signal improvement and would be less than significant, as noted above. The Applicant will continue to work with the City of Burbank to identify an alternative feasible improvement to also mitigate the Project’s impact under Los Angeles Department of Transportation guidelines to less than significant. As stated on Page 660 of the Draft EIR, if a proposed traffic mitigation measure in another jurisdiction, such as the City of Burbank, is determined to be infeasible or necessary permits/approvals to implement the mitigation measure cannot be obtained, then a significant impact (or impacts) may remain. Refer also to Response to Comment No. 12-181.

**Comment No. 12-183**

| 69 | Mitigation B-31 | Pass Avenue & Riverside Drive (Intersection 80): The Project Applicant or its successor shall implement or contribute to the implementation of an eastbound right-turn lane so that the Riverside Drive eastbound approach would have a left-turn lane, two through lanes, and a right-turn lane. Additional mitigation in response to the Burbank Analysis is as follows. The Project Applicant or its successor shall: (1) implement or contribute to the implementation of a right-turn lane so that the Riverside Drive westbound approach would have a left-turn lane, two through lanes, and a right-turn lane, and (2) provide or contribute to the provision of additional signal equipment to Project applicant shall be responsible for implementation of mitigation. |
connect the intersection to the City of Burbank’s Citywide Signal Control System.

Response to Comment No. 12-183

As noted in Response to Comment No. 12-47 above, as required by the Los Angeles Department of Transportation, the Project would implement all of the project design features and mitigation measures required as part of the Project’s approvals if the mitigation measures are approved by the governing jurisdictions. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-184

| 69 | Mitigation B-32 | Pass Avenue & Olive Avenue (Intersection 81): The Project Applicant or its successor shall: (1) implement or contribute to the implementation of an additional northbound left-turn lane so that the Pass Avenue northbound approach would have dual left-turn lanes and three through lanes, and (2) provide or contribute to the provision of additional signal equipment to provide overlapping right turn arrow signal indications for eastbound Olive Avenue. | Project applicant shall be responsible for implementation of mitigation. |

Response to Comment No. 12-184

As noted in Response to Comment No. 12-47, above, as required by the Los Angeles Department of Transportation, the Project would implement all of the project design features and mitigation measures required as part of the Project’s approvals if the mitigation measures are approved by the governing jurisdictions. Please note that the
mitigation measure referenced in the comment has been updated in response to comments from the City of Burbank. (See Correction and Addition No. IV.B.1.D, Section II, of this Final EIR.) The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-185**

<table>
<thead>
<tr>
<th>70</th>
<th>Mitigation B-33</th>
<th>Olive Avenue &amp; Warner Brothers Studios Gate 2/Gate 3 (Intersection 82): The Project Applicant or its successor shall provide or contribute to the provision of additional signal equipment to connect the intersection to the City of Burbank’s Citywide Signal Control System.</th>
<th>Project applicant shall be responsible for implementation of mitigation.</th>
</tr>
</thead>
</table>

**Response to Comment No. 12-185**

As noted in Response to Comment No. 12-47, above, as required by the Los Angeles Department of Transportation, the Project would implement all of the project design features and mitigation measures required as part of the Project’s approvals if the mitigation measures are approved by the governing jurisdictions. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-186**

<table>
<thead>
<tr>
<th>70</th>
<th>Mitigation B-34</th>
<th>Olive Avenue &amp; Warner Brothers Studios Gate 1/Lakeside Drive (Intersection 83): The Project Applicant or its successor shall implement or contribute to the implementation of an eastbound right-turn lane so that the Lakeside Drive eastbound approach would have a shared through/left</th>
<th>Project applicant shall be responsible for implementation of mitigation.</th>
</tr>
</thead>
</table>
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<tr>
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<th>lane and a right-turn lane. Additional mitigation in response to the Burbank Analysis is as follows. The Project Applicant or its successor shall provide or contribute to the provision of additional signal equipment to connect the intersection to the City of Burbank’s Citywide Signal Control System.</th>
</tr>
</thead>
</table>

**Response to Comment No. 12-186**

As noted in Response to Comment No. 12-47, above, as required by the Los Angeles Department of Transportation, the Project would implement all of the project design features and mitigation measures required as part of the Project’s approvals if the mitigation measures are approved by the governing jurisdictions. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-187**

| 70 | Mitigation B-35 | Hollywood Way & Alameda Avenue (Intersection 84): Additional mitigation in response to the Burbank analysis is as follows: The Project Applicant or its successor shall provide or contribute to the implementation of additional signal equipment to connect the intersection to the City of Burbank’s Traffic Signal Interconnect & Signal Timing System and Citywide Signal Control System. | Project applicant shall be responsible for implementation of mitigation. |
Response to Comment No. 12-187

As noted in Response to Comment No. 12-47, above, as required by the Los Angeles Department of Transportation, the Project would implement all of the project design features and mitigation measures required as part of the Project’s approvals if the mitigation measures are approved by the governing jurisdictions. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-188

| 70 | Mitigation B-36 | Hollywood Way & Olive Avenue (Intersection 86): Additional mitigation in response to the Burbank analysis is as follows: The Project Applicant or its successor shall provide or contribute to the implementation of additional signal equipment to connect the intersection to the City of Burbank’s Traffic Signal Interconnect & Signal Timing System and Citywide Signal Control System. | Project applicant shall be responsible for implementation of mitigation. |

Response to Comment No. 12-188

As noted in Response to Comment No. 12-47, above, as required by the Los Angeles Department of Transportation, the Project would implement all of the project design features and mitigation measures required as part of the Project’s approvals if the mitigation measures are approved by the governing jurisdictions. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-189

| 70 | Mitigation B-37 | Olive Avenue & Riverside Drive (Intersection 87): | Project applicant shall be responsible for implementation |
Additional mitigation in response to the Burbank analysis is as follows: The Project Applicant or its successor shall provide or contribute to the implementation of additional signal equipment to connect the intersection to the City of Burbank’s Traffic Signal Interconnect & Signal Timing System and Citywide Signal Control System.

Response to Comment No. 12-189

As noted in Response to Comment No. 12-47, above, as required by the Los Angeles Department of Transportation, the Project would implement all of the project design features and mitigation measures required as part of the Project’s approvals if the mitigation measures are approved by the governing jurisdictions. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-190

| Mitigation B-38 | Ventura Freeway westbound on-ramp and Alameda Avenue (Intersection 164): The Project Applicant or its successor shall signalize the intersection with protected left-turn phasing for the eastbound approach. Due to the close proximity of this intersection with the intersection of Hollywood Way & Alameda Avenue (Intersection 84), the signals at the two intersections would need to be coordinated. It | Project applicant shall be responsible for implementation of mitigation. |
should be noted that the satisfaction of a traffic signal warrant shall not in itself require the installation of a signal. The decision on whether a traffic signal should be installed will be made by the City of Burbank and Caltrans at the time of the proposed improvement taking into consideration other factors such as spacing with adjacent signalized intersections and interruption to traffic flow along the major street. Depending on the spacing of adjacent signalized intersections and the traffic flow, it may not be feasible to install a signal at the unsignalized intersection.

**Response to Comment No. 12-190**

As noted in Response to Comment No. 12-47, above, as required by the Los Angeles Department of Transportation, the Project would implement all of the project design features and mitigation measures required as part of the Project’s approvals if the mitigation measures are approved by the governing jurisdictions. Please note that the mitigation measure referenced in the comment has been deleted in response to comments from the City of Burbank. (See Correction and Addition No. IV.B.1.E, Section II, of this Final EIR.) The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-191**

| No. | Mitigation B-39 | Hollywood Freeway northbound on-ramp & Moorpark Street (Intersection 161): This improvement includes signalization of the | This mitigation is one block from Oakwood School and as mentioned in many other sections of this response, the amount of increased traffic on |
intersection with permitted left-turn phasing for the eastbound approach. The closest signalized intersection is approximately 430 feet from this location and hence this improvement would not create closely-spaced intersections. Signal warrant worksheets are provided in Appendix M of the transportation Study. As shown in the signal warrants, the intersection does not meet signal warrants with the traffic projections in 2030. Based on consultation with Los Angeles Department of Transportation, this intersection would be monitored and the Applicant or its successor shall install or contribute to the installation of a signal would be installed when traffic volumes warrant the signalization of the intersection. A significant Project impact would remain at this intersection until the signal is installed.

<table>
<thead>
<tr>
<th>response to comment No. 12-191</th>
</tr>
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</table>

As explained on page 691 in Section IV.B.1, Traffic/Access – Traffic/Circulation of the Draft EIR and in the Transportation Study (Appendix E-1 to the Draft EIR), the decision on whether a traffic signal will be installed will be made by the governing jurisdiction, in this case the Los Angeles Department of Transportation, at the time of the proposed improvement taking into consideration other factors such as spacing with then existing adjacent signalized intersections and interruption to traffic flow along the major street. Depending on the spacing of adjacent signalized intersections and the traffic flows, it may
not be feasible to install a signal at the unsignalized intersections. If it is not feasible to install a signal a significant and unavoidable impact would remain.

As noted in Mitigation Measure B-39, the intersection does not meet signal warrants with the traffic projections in 2030. Based on consultation with the Department of Transportation the intersection would be monitored and the Applicant or its successor shall install or contribute to the installation of a signal when traffic volumes warrant the signalization. The proximity of a school to the intersection is one factor that the Los Angeles Department of Transportation will consider when evaluating the signal warrant for this intersection.

**Comment No. 12-192**

| 72 | Traffic Flow and Safety Left Turn Signals | Project has agreed to implement left-turns at key intersections in the vicinity of the Project Site in an effort to improve traffic flow and safety along the corridors as conditions warrant. If the traffic volumes at the intersections meet left-turn phasing warrants, the Project would pay for the installation of the left-turn signals at these intersections. The Project will conduct periodic reviews of left-turn conditions during the implementation of the intersection improvements to determine if left-turn phasing is warranted. It should be noted that these improvements are not required to mitigate the Project’s impacts. |
| All periodic studies and reviews of left-turn conditions must be based on current traffic volume studies. If the studies show that left turn signals are required, the applicant will install such mitigations in a timely manner working with the city in determining the order of intersection mitigation. Current numbers should be used not numbers from 2007. |
Response to Comment No. 12-192

The review of left-turn conditions and phasing warrants identified in Section IV.B.1.5.e of the Draft EIR would be conducted per standard Los Angeles Department of Transportation requirements. As stated on page 679 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, the left-turn signal improvements are not required to mitigate the Project’s impacts. The commenter is referred to Response to Comment No. 12-145 regarding the timing of the traffic analysis. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-193

<table>
<thead>
<tr>
<th>72</th>
<th>Traffic Flow and Safety Program: Left Turn Signals</th>
<th>The following locations have been identified for left-turn signals:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>11. Vineland Avenue &amp; Moorpark Street -eastbound approach</td>
</tr>
<tr>
<td></td>
<td></td>
<td>17. Riverton Avenue/Campo de Cahuenga Way &amp; Ventura Boulevard -westbound approach</td>
</tr>
<tr>
<td></td>
<td></td>
<td>19. Lankershim Boulevard &amp; Riverside Drive -eastbound approach</td>
</tr>
<tr>
<td></td>
<td></td>
<td>20. Lankershim Boulevard &amp; Moorpark Street -northbound and eastbound Approaches</td>
</tr>
<tr>
<td></td>
<td></td>
<td>26. Cahuenga Boulevard &amp; Camarillo Street -all approaches</td>
</tr>
<tr>
<td></td>
<td></td>
<td>28. Cahuenga Boulevard &amp; SR 134 eastbound ramps -southbound approach</td>
</tr>
<tr>
<td></td>
<td></td>
<td>30. Cahuenga Boulevard &amp;</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Intersections 11, 116, and 117 all impact Studio City neighborhoods. The DEIR does not identify Studio City as having any neighborhoods impacted and this must be corrected. Those Studio City neighborhoods that are impacted must receive impaction mediation as needed.</td>
</tr>
</tbody>
</table>
### Response to Comment No. 12-193

As described in Section IV.B.1.5.e of the Draft EIR, the left-turn studies noted in the comment are not required as part of the Project mitigation and are a voluntary improvement agreed to by the Applicant. Therefore, the comment incorrectly states that this improvement measure is to mitigate the Project’s impact at Intersections 11, 116, and 117. It is not entirely clear what the comment means by “impaction mediation”, and the commenter also seems to confuse intersection impacts and neighborhood intrusion impacts. Intersection impacts are described by intersection whereas neighborhood intrusion impacts are described by the neighborhoods in which the “cut-through” traffic may occur. The commenter is referred to Response to Comment Nos. 12-142 and 12-157, above and Topical Response No. 7: Neighborhood Intrusion (see Section III.C, Topical Responses, of this Final EIR), for details on neighborhood intrusion impacts. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

<table>
<thead>
<tr>
<th>Moorpark Street-northbound and southbound Approaches</th>
</tr>
</thead>
<tbody>
<tr>
<td>34. Lankershim Boulevard &amp; Valleyheart Drive/James Stewart Avenue-northbound approach</td>
</tr>
<tr>
<td>116. Radford Avenue/Ventura Place &amp; Ventura Boulevard - eastbound and westbound approaches</td>
</tr>
<tr>
<td>117. US 101 southbound on-ramp/Fruitland Drive &amp; Ventura Boulevard - westbound approach</td>
</tr>
<tr>
<td>140. Lankershim Boulevard &amp; Chandler Boulevard (North) - northbound approach</td>
</tr>
</tbody>
</table>
Comment No. 12-194

72 Traffic Flow and Safety Program: Left Turn Signals

Based on discussions with the Los Angeles Department of Transportation, as part of this program, the Project would also fund the installation of a traffic signal at the intersection of Strohm Avenue & Riverside Drive to make it safer for motorists to turn into and out of Strohm Avenue. This signal would also help in reducing traffic from side streets. Those Studio City neighborhoods that are impacted must receive impaction mediation as needed.

Response to Comment No. 12-194

The commenter is referred to Response to Comment Nos. 12-142, 12-157, and 12-193, above.

Comment No. 12-195

73 (E) Hollywood Event Management Infrastructure

One of the seven major components of the Project’s transportation improvement and mitigation program is the implementation of a Transportation System Management program in the form of improvements to the Hollywood Event Management infrastructure. This Project improvement would consist of the installation of signs that would provide motorists on arterial streets leading up to Hollywood from other parts of the region with advance information and warning. The applicant should consult with the Department of Transportation as to the proper number of event signs required and the geographical placement of those signs to insure that this mitigation is sufficient. These signs shall not impact existing uses in the area.
regarding lane closures due to events in Hollywood, accidents, etc. This information would help the motorists in using alternative routes of travel thus avoiding long delays and preventing further congestion. As such, the Applicant or its successor shall pay for up to five changeable message signs as part of the Hollywood Event Management infrastructure. It should be noted that these improvements are not required to mitigate the Project’s impacts.

Response to Comment No. 12-195

As stated in the Los Angeles Department of Transportation’s Assessment Letter, “the design, size, and placement of these signs will be determined by the Department of Transportation.” The Los Angeles Department of Transportation currently uses two forms of changeable message signs: portable signs that are mounted on trailers similar to construction message signs, and permanent signs similar to those in place in areas of Hollywood and Downtown Los Angeles. The City of Los Angeles Department of Transportation, Special Provisions and Standard Drawings for the Installation and Modification of Traffic Signals, “Red Book”, dated July 2008 provides specifications for changeable message signs. The maximum size sign shown in the specifications is a 5’ by 12’ sign face that extends 14’ over the roadway at a height of approximately 22’. This type of sign is installed in the public right of way 3’ off of the curb. The Los Angeles Department of Transportation is evaluating available technologies that minimize the amount of sidewalk or public right of way needed for the sign. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
**Comment No. 12-196**

| 73  | Los Angeles County Congestion Management Plan Freeway Segment Improvements | No feasible mitigation measures beyond those identified above are available to address Project impacts to Los Angeles County Congestion Management Plan freeway segments. | Some Freeway segments are significantly impacted as a result of the Project after all mitigation occurs. This is unacceptable and the project must be scaled back to a point that will not cause any freeway significant unavoidable impacts. |

**Response to Comment No. 12-196**

With regard to significant and unavoidable impacts as well as impacts under Alternative 4, which reduces on-site development, the commenter is referred to Response to Comment No. 12-5, above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-197**

| 74  | (H) Regional Transit System Capacity Impacts | With implementation of the mitigation measures identified above, all of the significant Project impacts related to the regional transit system would be reduced to a less than significant level. No additional mitigation is required. | We question the use of one bus to supplement the mass transit system and the time frame for the subsidies tied to it. Shuttle time frames may not be sufficient. |

**Response to Comment No. 12-197**

The commenter is referred to Response to Comment No. 12-163, above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
### Comment No. 12-198

<table>
<thead>
<tr>
<th>#</th>
<th>Mitigation</th>
<th>Description</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>74</td>
<td>B-40</td>
<td>All construction workers shall be prohibited from parking on neighborhood streets offsite. To the extent that parking would not be available on-site, parking shall be provided by Applicant or its successor at offsite locations. A construction worker shuttle service shall be provided if an offsite parking lot is not within reasonable walking distance of the Project Site.</td>
<td>All construction parking should occur on site.</td>
</tr>
</tbody>
</table>

### Response to Comment No. 12-198

As stated on page 950 in Section IV.B.2, Traffic/Access – Parking, of the Draft EIR, during construction an adequate number of on-site parking spaces would be available at all times or the Project would provide a shuttle to an off-site parking location for the construction workers. Furthermore, as provided in Mitigation Measure B-44 (Mitigation Measure B-41 in the Draft EIR), the Project Applicant or its successor shall prepare construction traffic management plans satisfactory to the affected jurisdiction. The construction traffic management plan shall, among other elements, provide, as appropriate, that construction-related vehicles shall not park on any residential streets.

### Comment No. 12-199

<table>
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<tr>
<th>#</th>
<th>Mitigation</th>
<th>Description</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>74 - 75</td>
<td>B-41</td>
<td>The Project Applicant or its successor shall prepare construction traffic management plans, including but not limited to street closure information, detour plans, haul routes, and staging plans, satisfactory to the affected jurisdictions. The construction traffic management plans shall be</td>
<td>Construction parking configuration should be completely on site.</td>
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</tbody>
</table>
based on the nature and timing of the specific construction and other projects in the vicinity of the Project Site, and shall include the following elements as appropriate:

1. Provisions to configure construction parking to minimize traffic interference;

2. Provisions for temporary traffic control during all phases of construction activities to improve traffic flow on public roadways (e.g., flag person);

3. Scheduling construction activities to reduce the effect on traffic flow on public roadways;

4. Rerouting construction trucks to reduce travel on congested streets;

5. Consolidating construction truck deliveries;

6. Provision of dedicated turn lanes for movement of construction trucks and equipment on-and off-site;

7. Construction-related vehicles shall not park on any residential street;
Response to Comment No. 12-199

The issue raised in this comment has been addressed in Response to Comment No. 12-198, above. The commenter is referred to Response to Comment No. 12-198.

**Comment No. 12-200**

| 74 - 75 | Mitigation B-41 | The Project Applicant or its successor shall prepare construction traffic management plans, including but not limited to street closure information, detour plans, haul routes, and staging plans, satisfactory to the affected jurisdictions. The construction traffic management plans shall be based on the nature and timing of the specific construction and other projects in the vicinity of the Project Site, and shall include the following elements as appropriate:
|          |                | 1. Provisions to configure construction parking to minimize traffic interference;
|          |                | 2. Provisions for temporary traffic control during all phases of construction activities to improve traffic flow on public roadways (e.g., flag person);
|          |                | 3. Scheduling construction activities to reduce the effect on traffic flow on public roadways;
|          |                | 4. Rerouting construction |
|          |                | Construction hauling should not take place during peak hours. |
trucks to reduce travel on congested streets;

5. Consolidating construction truck deliveries;

6. Provision of dedicated turn lanes for movement of construction trucks and equipment on-and off-site;

7. Construction-related vehicles shall not park on any residential street;

Response to Comment No. 12-200

As provided in Mitigation Measure B-41 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, (Mitigation Measure B-44 in the Final EIR) the Project Applicant or its successor shall prepare construction traffic management plans satisfactory to the affected jurisdiction. The construction traffic management plan shall be based on the nature and timing of the specific construction and other projects in the vicinity of the Project Site, and shall include, among other elements, the following as appropriate: scheduling construction activities to reduce the effect on traffic flow on public roadways and scheduling construction-related deliveries, other than concrete and earthwork-related deliveries, to reduce travel during peak travel periods. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-201

| 74-75 | Mitigation B-41 | The Project Applicant or its successor shall prepare construction traffic management plans, including but not limited to street closure information, detour plans, haul routes, and staging plans, satisfactory to the affected jurisdictions. The construction traffic No construction traffic will be allowed on residential streets. No construction related vehicles will be in residential neighborhoods at any time. |
Management plans shall be based on the nature and timing of the specific construction and other projects in the vicinity of the Project Site, and shall include the following elements as appropriate:

1. Provisions to configure construction parking to minimize traffic interference;

2. Provisions for temporary traffic control during all phases of construction activities to improve traffic flow on public roadways (e.g., flag person);

3. Scheduling construction activities to reduce the effect on traffic flow on public roadways;

4. Rerouting construction trucks to reduce travel on congested streets;

5. Consolidating construction 4truck deliveries;

6. Provision of dedicated turn lanes for movement of construction trucks and equipment on-and off-site;

7. Construction-related vehicles shall not park on any residential street;
Response to Comment No. 12-201

As provided in Mitigation Measure B-41 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, the Project Applicant or its successor shall prepare construction traffic management plans satisfactory to the affected jurisdiction. The construction traffic management plan shall, among other elements, provide, as appropriate, that construction-related vehicles shall not park on any residential streets. Also, as shown in Figure 72 in Section IV.B.1 of the Draft EIR, the proposed haul routes do not travel through any residential streets. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-202

| Mitigation B-41 | The Project Applicant or its successor shall prepare construction traffic management plans, including but not limited to street closure information, detour plans, haul routes, and staging plans, satisfactory to the affected jurisdictions. The construction traffic management plans shall be based on the nature and timing of the specific construction and other projects in the vicinity of the Project Site, and shall include the following elements as appropriate:
| Pedestrian safety is critical during and after construction at the main entrance and all other entrances along Lankershim. Additional pedestrian safety mitigations need to be implemented, such as a bridge or completion of the Metro Tunnel. Construction traffic, including hauling, cannot take place during peak hours or on residential streets. The Ventura/Cahuenga Blvd. Corridor Specific Plan prohibits hauling on Ventura and Cahuenga Boulevards. |
| --- | --- |
| 74 - 75 | 1. Provisions to configure construction parking to minimize traffic interference; 2. Provisions for temporary traffic control during all phases of construction activities to improve traffic flow on public
<p>| | | |</p>
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<td>roadways (e.g., flag person); 3. Scheduling construction activities to reduce the effect on traffic flow on public roadways; 4. Rerouting construction trucks to reduce travel on congested streets; 5. Consolidating construction truck deliveries; 6. Provision of dedicated turn lanes for movement of construction trucks and equipment on-and off-site; 7. Construction-related vehicles shall not park on any residential street;</td>
<td></td>
</tr>
</tbody>
</table>

**Response to Comment No. 12-202**

Regarding pedestrian safety and the construction of a bridge or tunnel across Lankershim, the commenter is referred to Response to Comment No 12-144, above. Regarding construction traffic during peak hours, the commenter is referred to Response to Comment No. 12-200, above. Regarding hauling on Ventura Boulevard and Cahuenga Boulevard, this comment appears to be incorrect, as there is no text in the Ventura–Cahuenga Boulevard Corridor Specific Plan prohibiting hauling on Cahuenga or Ventura Boulevards. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-203**

| 74-75 | Mitigation B-41 | 8. Provision of safety precautions for pedestrians and bicyclists through such measures as alternate routing, and protection barriers; The applicant will provide funds to the Department of Transportation in the amount necessary to fund the Transportation Neighborhood |
9. All contractors shall be required to participate in a common carpool registry during all periods of contract performance monitored and maintained by the contractor;

10. Schedule construction-related deliveries, other than concrete and earthwork-related deliveries to reduce travel during peak travel periods;

11. Construction vehicle travel through neighboring jurisdictions other than the City of Los Angeles shall be conducted in accordance with the standard rules and regulations established by the respective jurisdictions where such jurisdictions would be subject to construction impacts. These include allowable operating times for construction activities, truck haul routes, clearance requirements, etc.;

12. Prior to the issuance of any permit for the Project, required permits for the truck haul routes if applicable shall be obtained from the City of Los Angeles;

13. Obtain a Caltrans transportation permit for use of oversized transport vehicles on Caltrans facilities; and

### Traffic Management Plan

Traffic Management Plan as per the requirements and specifications of the Los Angeles Department of Transportation. Additionally, the applicant will correct the list of communities set forth in Appendix E-1 of the DEIR to correctly identify all the communities affected including Studio City.
14. Submit a traffic management plan to Caltrans for approval to avoid potential access restrictions to and from Caltrans facilities.

Response to Comment No. 12-203

With regard to potentially impacted neighborhoods, as described in Mitigation Measure B-42 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, (Mitigation Measure B-45 in the Final EIR) all neighborhoods that have been identified as potentially impacted in the Draft EIR would be eligible for funding, pursuant to a mechanism acceptable to the Los Angeles Department of Transportation, for implementation of the Los Angeles Department of Transportation’s Neighborhood Traffic Management Plan process. Regarding impacted neighborhoods within Studio City, the commenter is referred to Response to Comment Nos. 12-142, 12-157, and 12-193, above. With regard to neighborhood intrusion traffic impacts, refer to Topical Response No. 7: Neighborhood Intrusion (see Section III.C, Topical Responses, of this Final EIR) for additional details. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-204

| 75-76 | Mitigation B-42 | Pursuant to the schedule established in the final adopted sub phasing program, the Applicant or its successor shall provide funding pursuant to a mechanism, reasonably acceptable to the Los Angeles Department of Transportation in an amount up to $500,000 for implementation of the City of Los Angeles Department of Transportation’s Neighborhood Traffic Management Plan process for the Project set forth in Appendix E-I of this Draft EIR. | Further studies must be conducted to determine if a significant impact would remain after the neighborhood intrusion mitigation is complete. It is unacceptable to leave residential neighborhoods significantly impacted by traffic in residential neighborhoods due to over development of the Project. |
Eligible communities shall include the residential neighborhoods within the boundaries listed below and as shown in Figure 82:

a. Riverside Drive to the north, Cartwright Avenue to the east, Landale Street/Woodbridge Street to the south, and Vineland Avenue/Lankershim Boulevard to the west;

b. Kling Street to the north, Lankershim Boulevard to the east, the SR 134 freeway to the south, and Vineland Avenue to the west;

c. Sarah Street to the north, Ledge Avenue/Placidia Avenue to the east, Valley Spring Lane/Moorpark Street to the south, and Cahuenga Boulevard to the west;

d. Franklin Avenue to the north, El Cerrito Place to the east, Yucca Street to the south, and La Brea Avenue to the west; and

e. The neighborhood on the west side of Orange Drive between Franklin Avenue and Hawthorn Avenue.

| Mitigation B-42 | Implementation of the improvements may reduce the neighborhood intrusion impacts to less than **significant**. However, as Further studies must be conducted to determine if a **significant** impact would remain after the neighborhood intrusion mitigation is complete. |
discussed above at this time it is not known whether a particular community will elect to implement a particular set of mitigation measures or if the agreed upon measures will reduce the impacts to less than significance. [sic] Therefore, it is conservatively concluded that mitigation of the potential neighborhood intrusion impact will not be feasible and a significant traffic intrusion impact in the identified neighborhoods would remain.

| It is unacceptable to leave residential neighborhoods significantly impacted by traffic in residential neighborhoods due to over development of the Project. |

**Response to Comment No. 12-204**

As explained in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, based on the transportation study analyses, it is possible to identify those neighborhoods that might be susceptible to neighborhood intrusion impacts (cut-through traffic) as a result of the Project. It is not, however, possible to predict with a reasonable degree of certainty whether such neighborhood intrusion traffic will occur at a level sufficient to result in a significant adverse impact in any of the identified neighborhoods as the changes in traffic patterns are based on a number of factors, including individual driver perception of the likely reduction in travel time on alternative routes (neighborhood streets). Nor is it possible to predict in which neighborhoods or on which streets within each neighborhood any such potentially significant neighborhood intrusion traffic impacts might occur. In addition, because of the fact that such assessments cannot be made at this time, it also cannot be determined whether any feasible mitigation measures could be implemented that would lessen or eliminate any such potentially significant impacts or determine what neighborhood measures the local community would prefer over the potentially significant neighborhood traffic intrusions.

As explained in detail on pages 638-649 of the Draft EIR, “a potentially significant neighborhood traffic intrusion impact on a particular residential neighborhood can only be determined after a project or portions of a project are completed and operating. Prior to a project becoming operational it is virtually impossible to quantify potential impacts.” Once a
project is operational, a neighborhood can be assessed to determine if any impacts are occurring, the nature of the impacts and whether those impacts can be addressed through a Neighborhood Traffic Management Plan. The Los Angeles Department of Transportation has developed a process over many years to assess whether impacts are occurring, the nature of the impacts and a range of traffic measures designed to address potentially significant impacts. The Los Angeles Department of Transportation process is an iterative process through which the impacted neighborhood is included in the process to help assess which traffic-calming options are preferred by the community at issue, to balance the relative desirability of the options, and ultimately to let the community itself make the decision whether to implement the traffic-calming measures. In some neighborhoods, the potential significant impact never materializes. In locations where a significant impact does occur, the community may decide to implement traffic-calming measures that reduce the impact to below a level of significance and, in other neighborhoods, the measures themselves are considered to be undesirable and so the community prefers not to implement them and the neighborhood intrusion traffic remains significant and unmitigated. The commenter is also referred to Topical Response No. 7: Neighborhood Intrusion (see Section III.C, Topical Responses, of this Final EIR) for information on neighborhood intrusion impacts. Regarding significant and unavoidable impacts, the commenter is referred to Response to Comment No. 12-5, above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-205

| 76 | Project Access (Operational) | Due to physical constraints, no mitigation measures beyond those identified above are available that would fully mitigate the Project’s access impacts to less than significant. | It is unacceptable for the Project to have permanent significant impacts at its access points, especially when a large residential neighborhood (the Island Neighborhood in Studio City) is directly across the street and that neighborhood is dependant [sic] on one street for egress and ingress. That access street is connected to and dependant [sic] on the main entry points of the project directly. |
**Response to Comment No. 12-205**

As noted in the Draft EIR, the Project would have significant access impacts at the intersections of Lankershim Boulevard & Campo de Cahuenga Way/Universal Hollywood Drive (Intersection 36) and Barham Boulevard & Lakeside Plaza Drive/Forest Lawn Drive (Intersection 55). As shown in Table 28 in Section IV.B.1, Traffic/Access – Traffic/ Circulation, of the Draft EIR, both intersections are projected to operate at Level of Service F even under Future without Project conditions, without the addition of Project traffic. The Project’s mitigation program includes all feasible mitigation measures to improve the operating conditions of these intersections. However, due to physical constraints and/or existing buildings, no feasible mitigation measures can be implemented to reduce the Project’s access impact at these locations to a level below significance.

It should also be noted that as shown in Table 38 in Section IV.B.1 of the Draft EIR, the Project does not have a significant impact at the access location serving the Island neighborhood noted in the comment: Lankershim Boulevard & Valleyheart Drive/James Stewart Avenue (Intersection 34).

The commenter is referred to Response to Comment No. 12-5, above, for additional information regarding significant and unavoidable impacts. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-206**

| 76 | Bicycle, Pedestrian & Vechicular Safety Impacts | No significant impacts related to bicycle, pedestrian and vehicular safety were identified, and no mitigation measures are recommended. | The bicycle, pedestrian, auto (entrance & exit) along with the shuttle service all end up at the same spot across the street from the Metro station. This creates an unsafe environment for the pedestrians and a bridge or tunnel should be constructed for pedestrians to use. Additionally, there should be an addition bicycle path running east west along the river to allow an additional exit for riders and walkers to exit further up Lankershim beyond the Project access points. This one exit at this point on |
Lankershim is unacceptable. The East/West road at the northern lot line is necessary.

### Response to Comment No. 12-206

The shuttle service would have stops not only at or near the Universal City Metro Red Line station west of Lankershim Boulevard, but also at on-site locations within the Entertainment Area, and at various locations along the proposed North-South Road within the Mixed-Use Residential Area.

Regarding a pedestrian bridge or tunnel, please refer to Response to Comment No. 12-144. Regarding a bicycle path along the Los Angeles River, please refer to Response to Comment No. 12-154, above.

Regarding the East-West Road, please refer to Response to Comment No. 12-61.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

### Comment No. 12-207

| 76 | Mitigation B-43 | The Project Applicant or its successors shall make a fair-share contribution as determined by Caltrans toward any improvements to the study on-and off-ramp impacts and that are implemented by the year 2030. | The applicant must be responsible for the entire cost of the study. |

### Response to Comment No. 12-207

Regarding funding for freeway improvements, please refer to Response to Comment No. 12-47, above. See also Topical Response No. 6: Freeway Improvements (see Section III.C, Topical Responses, of this Final EIR). The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
### Comment No. 12-208

| Comment No. 12-208 | Mitigation B-44 | The Project Applicant or its successors shall make a fair-share contribution as determined by Caltrans toward any improvements to the study freeway segments that would mitigate the Project’s freeway segment impacts and that are implemented by the year 2030. | Applicant must have all costs for mitigating freeway impacts in place as CalTrans [sic] may not (probably will not) have the funds to contribute. According to the traffic studies included in this DEIR, there are 6 freeway segments that are significantly impacted -even with all mitigation in place -some of which are the 101 north of Campo de Cahuenga, 101 south of Barham and the 101 east of the 405, all of which surround the project. As a result, the project should be scaled back to a point that there would be no significant freeway impacts as a result of the project. |

### Response to Comment No. 12-208

Refer to Response to Comment Nos. 12-5 and 12-47 regarding freeway impacts. With regard to significant and unavoidable impacts as well as impacts under alternatives analyzed in the Draft EIR which reduce on-site development, the commenter is referred to Response to Comment No. 12-5, above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

### Comment No. 12-209

| Comment No. 12-209 | Paragraph 3 | The Project’s sub-phasing plan ties the implementation of the traffic improvements proposed as part of the Project with the developments in different zone groups. The Project speaks of Applicant & Successors Traffic Mitigation Responsibilities in various aspects of the Project, additionally; the phasing, sub phasing and zones appear to |
The following zone groups have been identified for this analysis:

1. Zone A - Studio/Business Areas
2. Zone B - Entertainment Area
3. Zone C - Mixed-Use Residential Area
4. Zones A & B – Studio/Business and Entertainment Areas
5. Zones B & C - Entertainment and Mixed-Use Residential Areas
6. Zones A & C - Studio/Business and Entertainment Areas

Contemplate separate ownership and a division of responsibility. There will likely be multiple successor developers and/or owners in various portions of the project including studio, hotel, theme park, residential, mixed use and retail segments.

The Project’s sub-phasing plan ties the implementation of the traffic improvements proposed as part of the Project with the developments in different zone groups.

NBC Universal and its parent company shall remain joint and severally liable along with its successor owners for all mitigation measure and required project improvements. This must hold true regardless of the phasing, sub phasing and zone classification of the traffic improvements.
Response to Comment No. 12-209

Mitigation measures required of the Project would be the obligation of the Applicant or its successor and would be implemented and monitored pursuant to the Project’s approved Mitigation Monitoring and Reporting Program. The mitigation measures required as part of the Project’s approvals will be included in the Mitigation Monitoring and Reporting Program, which provides for monitoring, implementation, and enforcement of all mitigation measures.

Comment No. 12-210

| 81 | Paragraph 3 | The Project’s sub-phasing plan ties the implementation of the traffic improvements proposed as part of the Project with the developments in different zone groups. | In addition, should the mixed use/residential portion be delayed, stalled or its ownership become insolvent, the studio/business area ownership and entertainment ownership shall install all traffic mitigation measures allocated to the mixed use/residential ownership. |

Response to Comment No. 12-210

As noted in Section IV.B.1.5.n, Traffic/Access – Traffic/Circulation, of the Draft EIR, similar to other developments in the City of Los Angeles, a detailed transportation mitigation phasing plan has been developed for the Project using trips as thresholds that were estimated based on the proposed development in each phase. The Project’s transportation mitigation phasing program has been designed such that the Project is required to implement all mitigation measures tied to each phase of development prior to moving onto the next development phase. The commenter is referred to Response to Comment No. 12-16 regarding phasing of implementation of mitigation.

Comment No. 12-211

| 81 | Paragraph 3 | The Project’s sub-phasing plan ties the implementation of the traffic improvements proposed as part of the Project with the developments | The residential use must be eliminated as all impacts are unavoidable impacts. |
Response to Comment No. 12-211

Regarding traffic impacts, the Draft EIR concluded that impacts related to traffic would remain significant and unavoidable, even after implementation of all feasible mitigation measures at nine intersections, six CMP freeway segments, two Project access locations, and with regard to potential neighborhood intrusion impacts. With regard to significant and unavoidable impacts, the commenter is referred to Response to Comment No. 12-5, above. Section V, Alternatives to the Proposed Project, of the Draft EIR analyzed project alternatives with reduced development. The commenter is referred to Section V of the Draft EIR for further information regarding Project alternatives.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-212

82 Paragraph 1

Some of the transportation improvements proposed as part of the Project are shared with the proposed Metro Universal project. The Project’s sub phasing plan identifies these improvements and their expected implementation date based on the proposed Metro Universal project phasing plan if that project proceeds. In the event that the proposed Metro Universal project is not approved or is delayed, the Project would pay the full implementation costs of these traffic improvements, in the identified phase, and be reimbursed by the proposed Metro Universal Project if and when that project is built. The applicant must be prepared to finance all mitigation required without the participation of the Metro Project. There is no clear schedule for the Metro Project and it may be scaled back or not built at all, which if not planned for would create an immense problem for the residents and commuters in the region.

Shared mitigations are unacceptable unless all unavoidable impacts are eliminated from both projects.
The implementation of these shared improvements would be determined based on the need for the improvement with respect to the net new trip generation and traffic impacts of the Project per the sub-phasing plan.

### Response to Comment No. 12-212

Regarding the sharing of mitigation measures, the commenter is referred to Response to Comment No. 12-14, above. With regard to significant and unavoidable impacts, the commenter is referred to Response to Comment Nos. 12-5 and 12-7, above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

### Comment No. 12-213

<table>
<thead>
<tr>
<th>82</th>
<th>Paragraph 4</th>
<th>(5) Level of Significance After Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>All traffic mitigation measures within the City shall be completed to the satisfaction of the Los Angeles Department of Transportation. If any of the traffic mitigation measures within the City of Los Angeles or any other jurisdiction are determined to be infeasible or necessary permits/approvals to implement the mitigation measures cannot be obtained, then a <strong>significant</strong> impact (or, impacts) may remain.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>The Project should be scaled back to a size that would not leave a <strong>significant</strong> impact after mitigation.</td>
</tr>
</tbody>
</table>
Response to Comment No. 12-213

With regard to significant and unavoidable impacts as well as impacts under alternatives analyzed in the Draft EIR which reduce on-site development, the commenter is referred to Response to Comment No. 12-5, above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-214

| 83  | (1) Construction | Project impacts related to in-street construction would be less than significant. | Rush hour traffic and resident traffic of the Island Neighborhood in Studio City will be severely impacted during in-street work on Lankershim Blvd. |

Response to Comment No. 12-214

As described in Response to Comment Nos. 12-144 and 12-200 above, as required by Mitigation Measure B-44 (Mitigation Measure B-41 in the Draft EIR), the Project Applicant or its successors would prepare detailed construction traffic management plans (Mitigation Measure B-41 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR), including street closure information, detour plans, haul routes, and staging plans satisfactory to the affected jurisdictions to reduce the effect on traffic flow on public roadways. The construction traffic management plans shall be based on the nature and timing of the specific construction and other projects in the vicinity of the Project Site and include numerous elements to ensure minimum impact on the street system and the surrounding community. The construction traffic management plans would address issues including, but not limited to, street closure information, detour plans, haul routes, and construction staging. The construction traffic management plans would be coordinated among the various City departments and non-City transportation agencies. As concluded on page 693 of the Draft EIR, with implementation of the transportation project design features and mitigation measures, Project impacts related to in-street construction would be less than significant. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-215

| 83  | (A) Intersection | With implementation of the | It is not acceptable to have any |
Level of Service | Transportation Demand Management program, regional and sub-regional transportation improvements, and specific intersection improvements, **significant and unavoidable impacts** would remain at the following nine intersections: (i) Intersection 22: Hollywood Freeway northbound ramps & Campo de Cahuenga Way - afternoon peak hour; Intersection 23: Metro Driveway & Campo de Cahuenga Way - afternoon peak hour; (ii) Intersection 29: Cahuenga Boulevard & Riverside Drive - both peak hours; (iii) Intersection 30: Cahuenga Boulevard & Moorpark Street - both peak hours; (iv) Intersection 33: Lankershim Boulevard & Cahuenga Boulevard - morning peak hour; (v) Intersection 35: Lankershim Boulevard & Main Street - afternoon peak hour; (vi) Intersection 36: Lankershim Boulevard & Campo de Cahuenga Way/Universal - Hollywood Drive - morning peak hour; (vii) Intersection 73: Lankershim Boulevard & Jimi Hendrix Drive - afternoon peak hour; and (viii) Intersection 82: Olive Avenue & Warner Brothers Studios Gate 2/Gate

**significant and unavoidable** impacts from this project, and these **significant and unavoidable** impacts are unacceptable. Of the 9 listed, 4 are on Lankershim in front of the Project and two others are across the street. These impacts will affect the Island Neighborhood in Studio City (across the street from the Project) in a very negative way permanently. Those intersections are 22, 23, 33, 35, 36, and 73.
### Response to Comment No. 12-215

With regard to significant and unavoidable impacts, the commenter is referred to Response to Comment No. 12-5, above. Regarding access to the Island neighborhood, the commenter is referred to Response to Comment No. 12-205, above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

### Comment No. 12-216

| 84 | Paragraph 2 | Any incremental increase in the Vehicle-to-Capacity ratio would occur at the 16 study freeway segments that can be attributed to the Project after the implementation of the Transportation Demand Management program, regional and sub-regional transportation improvements, and specific intersection improvements during the weekday morning and afternoon peak hours, respectively. With implementation of these mitigation measures, significant impacts would remain at the following six freeway segments:

   Segment 1: Hollywood Freeway south of Alvarado Street -afternoon peak hour (southbound);

   Segment 2: Hollywood Freeway south of Vermont |

|   |   | Any freeway significant impact as a result of the scope of the Project is unacceptable. The Project should be scaled back to a point that mitigation of traffic actually works. |   |
Avenue -afternoon peak hour (southbound);
Segment 3: Hollywood Freeway south of Santa Monica Boulevard -afternoon peak hour (southbound);
Segment 4: Hollywood Freeway south of Barham Boulevard -morning peak hour (northbound and southbound) and afternoon peak hour (southbound);

Affects Studio City Directly

Response to Comment No. 12-216

With regard to freeway impacts, the commenter is referred to Response to Comment Nos. 12-5 and 12-47, above. With regard to significant and unavoidable impacts, the commenter is referred to Response to Comment No. 12-5 above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-217

84-85 (D) Neighborhood Impacts

Mitigation measures have been identified to address the Project’s neighborhood intrusion impacts and the identified improvements would be applied to the boundaries of the identified

Applicant must redefine the neighborhoods impacted. Studio City is not listed as an impacted Community, even thought [sic] traffic mitigation is taking place on Lankershim Blvd, across the street from the
neighborhoods to ensure that the cut-through traffic diverted from these neighborhoods moves to the neighboring arterial and collector streets and does not result in a neighborhood traffic intrusion impact within another neighborhood. Implementation of the improvements may reduce the neighborhood intrusion impacts to less than significant.

| 84-85 | (D) Neighborhood Impacts | At this time it is not known whether consensus would be reached on the implementation of mitigation measures or if the agreed upon measures would reduce the impacts to less than significance [sic], to be conservative, it is concluded that mitigation of the potential neighborhood intrusion impacts would not be feasible. Therefore, it is conservatively concluded that a significant traffic intrusion impact in the identified neighborhoods would remain. |

| | Island Neighborhood and from Fruitland and Ventura. | This which [sic] will affect the neighborhood south of Ventura from Lankershim to Vineland and many other Studio City streets and intersections. It is unacceptable to leave any neighborhood with significant impact due to the scope of the Project. |

**Response to Comment No. 12-217**

The commenter seems to confuse intersection impacts and neighborhood intrusion impacts. Intersection impacts are described by intersection whereas neighborhood intrusion impacts are described by the neighborhoods in which the “cut-through” traffic may occur. The commenter is referred to Response to Comment Nos. 12-142 and 12-193 and
Topical Response No. 7: Neighborhood Intrusion (see Section III.C, Topical Responses, of this Final EIR), for details on neighborhood intrusion impacts. It should also be noted that as discussed on pages 638-649 of the Draft EIR and shown in Figure 68 of the Transportation Study (see Appendix E-1), which replaces Figure 73B in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR via Correction and Addition No. IV.B.1.K (see Section II of this Final EIR), the Project’s impact on the neighborhood south of Ventura Boulevard, between Vineland Avenue and Lankershim Boulevard, is mitigated to a less than significant level under the Future with Project with Funded Improvements scenario. Hence, the Project is not expected to have a significant impact on Fruitland Drive with the implementation of the proposed mitigation program.

With regard to significant and unavoidable impacts, the commenter is referred to Response to Comment No. 12-5, above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-218**

| 85 | (E) Project Access | Implementation of the identified mitigation measures would reduce impacts with regard to Project access. However, Project impacts related to Project access would remain significant at the following two access locations: 1. Lankershim Boulevard and Campo de Cahuenga Way/Universal Hollywood Drive -both morning and afternoon peak hours; and 2. Barham Boulevard and Lakeside/Forest Lawn Drive -both peak hours. Therefore, Project access impacts would be significant and unavoidable | This can be downgraded by the construction parking being kept on site and the inclusion of the original East/West road that runs along the river giving greater access to the Project both during the construction and after completion. |
Response to Comment No. 12-218

Regarding construction parking, the commenter is referred to Response to Comment No. 12-198, above. Regarding the East-West Road, the commenter is referred to Response to Comment No. 12-61, above. In addition, as described in Section V, Alternatives to the Proposed Project, of the Draft EIR, impacts to area intersections and freeways and air quality would be greater under Alternative 8 than under the proposed Project.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-219

| 85 | (G) Supplemental Caltrans Analysis | With the implementation of the mitigation measures identified in the section, Project impacts to on-and off-ramp locations would be reduced to less than significant levels; whereas weaving impacts would be reduced, but not to a less than significant level. No additional mitigation measures beyond those identified for on- and off-ramp and weaving impacts are required to address Project impacts. However, if Caltrans does not implement improvements to reduce impacts on the on-and off-ramps and freeway segments that would be affected by the Project, the Project’s on-and off-ramp and weaving impacts would remain significant and unavoidable. | The applicant should plan on financially backstopping any and all CalTrans [sic] freeway and all on/off ramp mitigation. Additionally, the Project must be reduced in scope to eliminate any unavoidable significant impacts after all mitigation measures have been implemented. |
**Response to Comment No. 12-219**

Regarding freeway and on/off ramp impacts and mitigation, as well as impacts under alternatives analyzed in the Draft EIR which reduce on-site development, the commenter is referred to Response to Comment Nos. 12-5 and 12-152, above. Regarding the sharing of mitigation measures, the commenter is referred to Response to Comment No. 12-14, above. With regard to significant and unavoidable impacts, the commenter is referred to Response to Comment No. 12-5, above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-220**

<table>
<thead>
<tr>
<th>No</th>
<th>Description</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>86</td>
<td>(B) Parking</td>
<td>During construction of the Project, an adequate number of on-site parking spaces would be available at all times or the Project would provide a shuttle to an off-site parking location for the construction workers. Therefore, Project construction would result in a less than <strong>significant</strong> impact with regard to the availability of parking spaces.</td>
</tr>
<tr>
<td></td>
<td>All construction parking must be on site during all phases.</td>
<td><strong>All construction parking must be on site during all phases.</strong></td>
</tr>
<tr>
<td>87</td>
<td>(B) County Specific Plan</td>
<td>The proposed County Specific Plan requirements provide for equal or more parking than that required by the Los Angeles County Code. The required parking for Project development is approximately 6,785 spaces. The Project includes 6,304 parking spaces for development under the proposed County Specific Plan. Considering the number of existing parking spaces, the number of parking spaces that would be added as part of the Project must be supplied during all phases of the build out of the Project.</td>
</tr>
<tr>
<td></td>
<td>On site construction parking must be supplied during all phases of the build out of the Project.</td>
<td><strong>On site construction parking must be supplied during all phases of the build out of the Project.</strong></td>
</tr>
</tbody>
</table>
interim projects, the number of parking spaces that would be removed during the Project’s demolition phases, and the number of proposed additional parking spaces, the Project would result in a surplus of 1,912 parking spaces at Project build out, based on the parking requirements outlined in the proposed County Specific Plan. Thus, the Project would provide sufficient parking to accommodate the proposed development within the County’s jurisdiction. Therefore, Project impacts related to parking under the proposed County Specific Plan would be less than significant.

**Response to Comment No. 12-220**

The commenter is referred to Response to Comment No. 12-198, above, regarding construction parking. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-221**

<table>
<thead>
<tr>
<th>2343 - 2448</th>
<th>IV. Summary of Significant and Unavoidable Impacts</th>
<th>B. Individual Environmental Issues</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1. Traffic</td>
<td>a. Construction Project impacts with regard to lane and sidewalk closures are concluded to be less than</td>
</tr>
<tr>
<td></td>
<td></td>
<td>There is no way to tell if the Metro Project will overlap with the Evolution Project, however, given the 21 year time lime [sic] of the Evolution Project it is safe to say there will be overlap with Metro or other proposed projects in the area.</td>
</tr>
</tbody>
</table>
III.D.1 Written Letters

**Response to Comment No. 12-221**

On pages 657–658 the Draft EIR concluded that while the Project’s impacts to lane and sidewalk closures would be less than significant, significant cumulative impacts with regard to lane and sidewalk closures would occur along Lankershim Boulevard if sidewalk closures from the Project and the Metro Universal project occurred at the same time. The Metro Universal project is no longer proposed. The commenter is referred to Topical Response No. 3: Defining the Proposed Project (see Section III.C, Topical Responses, of this Final EIR), for additional information regarding the Metro Universal project. As concluded in the Draft EIR, Project cumulative impacts with regard to lane and sidewalk closures at all other locations would be less than significant.

It is noted that the comment references the summary of significant and unavoidable impacts discussion in the Draft EIR, but references the wrong section number and range of pages for such discussion. The summary of significant and unavoidable impacts is Section VI starting at page 2434 of the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-222**

<table>
<thead>
<tr>
<th>2343 – 2448</th>
<th>IV. Summary of Significant and Unavoidable Impacts</th>
<th>B. Individual Environmental Issues</th>
<th>Any Significant or Unavoidable Impact that remains after the mitigation of the Project is unacceptable. The community should not</th>
</tr>
</thead>
</table>
a. Construction -Continued

This conclusion primarily results from the duration of the proposed Metro Universal project’s potential impacts, as Project impacts would be limited in location, as well as being intermittent and temporary. While significant lane closure impacts have the potential to occur, the permit process utilized by the Los Angeles Department of Transportation that the Project would follow is designed to minimize this type of impact (i.e., minimize the potential for multiple lane closures due to the implementation of mitigation measures in the same area at the same time).

b. Operations

(1) Roadway Intersections

An extensive series of project design features and mitigation measures have been identified to address the Project’s significant traffic impacts. While these measures would substantially reduce the Project’s intersection impacts, significant and unavoidable impacts would remain at the following roadway intersections:

Intersection 22: Hollywood suffer lasting Significant Impacts as a result of the project. Any Significant Impacts to Pedestrian, Intersection, freeway off ramps, freeway weaving and Neighborhood Intrusion are avoidable by reducing the size of the Project. Significant Impacts are avoidable by reducing the size and design of the Project. The Project must be reduced and redesigned to not impose Significant Impacts on the surrounding communities.
### Response to Comment No. 12-222

Regarding significant and unavoidable impacts, the commenter is referred to Response to Comment 12-5 above. Section V, Alternatives to the Proposed Project, of the Draft EIR analyzed project alternatives with reduced development. As discussed in the Draft EIR, these alternatives would generate significant traffic-related impacts. The commenter is referred to Section V, Alternatives to the Proposed Project, of the Draft EIR, for further information regarding project alternatives. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

### Comment No. 12-223

<table>
<thead>
<tr>
<th>2343 – 2448</th>
<th>IV. Summary of Significant and Unavoidable Impacts</th>
<th>B. Individual Environmental Issues</th>
<th>The Intersections that will have remaining Significant Impacts as a result of the project that effect Studio City are #'s 22, 23, 35, 36, and 73. All of these intersections are directly related</th>
</tr>
</thead>
</table>

City of Los Angeles
Final Environmental Impact Report

NBC Universal Evolution Plan
July 2012
This conclusion primarily results from the duration of the proposed Metro Universal project’s potential impacts, as Project impacts would be limited in location, as well as being intermittent and temporary. While significant lane closure impacts have the potential to occur, the permit process utilized by the Los Angeles Department of Transportation that the Project would follow is designed to minimize this type of impact (i.e., minimize the potential for multiple lane closures due to the implementation of mitigation measures in the same area at the same time).

b. Operations

(1) Roadway Intersections

An extensive series of project design features and mitigation measures have been identified to address the Project’s significant traffic impacts. While these measures would substantially reduce the Project’s intersection impacts, significant and unavoidable impacts would remain at the following roadway intersections:

Intersection 22: Hollywood Freeway northbound ramps & to the main entrance to Universal and are directly in front of the Metro Station and the Studio City Island Neighborhood. Commuter traffic on Lankershim and Cahuenga will be incredibly affected, and as a result, the Metro Project and the Evolution Project must not under any circumstances take place at the same time.
### IV. Summary of Significant and Unavoidable Impacts

#### B. Individual Environmental Issues

1. Traffic
   a. Construction - Continued

   - Intersection 35: Lankershim Boulevard & Main Street - afternoon peak hour;
   - Intersection 36: Lankershim Boulevard & Campo de Cahuenga Way/Universal Hollywood Drive - morning peak hour;
   - Intersection 73: Lankershim Boulevard & Jimi Hendrix Drive - afternoon peak hour;

   and

   - Intersection 82: Olive Avenue

<table>
<thead>
<tr>
<th>2343 – 2448</th>
<th>Campo de Cahuenga Way - afternoon peak hour;</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Intersection 23: Metro Driveway &amp; Campo de Cahuenga Way - afternoon peak hour;</td>
</tr>
<tr>
<td></td>
<td>Intersection 29: Cahuenga Boulevard &amp; Riverside Drive - both peak hours;</td>
</tr>
<tr>
<td></td>
<td>Intersection 30: Cahuenga Boulevard &amp; Moorpark Street - both peak hours;</td>
</tr>
<tr>
<td></td>
<td>Intersection 33: Lankershim Boulevard &amp; Cahuenga Boulevard - morning peak hour;</td>
</tr>
</tbody>
</table>
& Warner Brothers Studios
Gate 2/Gate 3 -afternoon peak hour.

In addition to the specific locations identified above, it is important to note that if any of the traffic mitigation measures within the City of Los Angeles or any other jurisdiction are determined to be infeasible as discussed in Section IV.B.1, Traffic Access-Traffic/Circulation, of this Draft EIR, or necessary permits/approvals to implement the mitigation measures cannot be obtained, then a significant impact (or impacts) may remain. Furthermore, if implementation of any measure is delayed, a significant impact would also occur until the implementation of the measure.

Cumulative conditions would result in significant impacts at several intersections and the proposed Project would contribute to these impacts. Thus, the Project’s contribution to impacts under future cumulative conditions would be considerable, and cumulative impacts would be significant at these intersections. While the Project’s mitigation measures would reduce several of the
**Response to Comment No. 12-223**

The comment appears to confuse Project operation intersection impacts with construction impacts. With regard to cumulative in-street construction impacts, please see Response to Comment No. 12-221, above. Regarding significant and unavoidable impacts, the commenter is referred to Response to Comment No. 12-5, above. With regard to access to the Island neighborhood, the commenter is referred to Response to Comment No. 12-205, above. Additionally, as required by Mitigation Measure B-44 (Mitigation Measure B-41 in the Draft EIR), the Project Applicant or its successor shall prepare construction traffic management plans, including but not limited to street closure information, detour plans, haul routes, and staging plans, satisfactory to the affected jurisdictions. The commenter is also referred to Topical Response No. 3: Defining the Proposed Project (see Section III.C, Topical Responses, of this Final EIR). The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-224**

<table>
<thead>
<tr>
<th>2343 – 2448</th>
<th>IV Summary of Significant and Unavoidable Impacts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>(2) Los Angeles County Congestion Management Plan</td>
</tr>
<tr>
<td></td>
<td>With implementation of the project design features and mitigation measures, significant Project and cumulative impacts would remain at the following seven freeway segments:</td>
</tr>
<tr>
<td></td>
<td>Segment 1: Hollywood Freeway south of Alvarado Street -afternoon peak hour (southbound);</td>
</tr>
<tr>
<td></td>
<td>Segment 2: Hollywood Freeway south of Vermont</td>
</tr>
</tbody>
</table>

Freeway segments 4, 5 and 10 affect the main entrance to Universal, the Metro Station, the Studio City Island Neighborhood and Ventura Blvd as well as Cahuenga Blvd. This is unacceptable and the project must be scaled back or redesigned to not have a significant or unavoidable impact.
Avenue -afternoon peak
Segment 3: Hollywood Freeway south of Santa Monica Boulevard -afternoon peak hour (southbound);
Segment 4: Hollywood Freeway south of Barham Boulevard -morning peak hour (northbound and southbound) and afternoon peak hour (southbound);
Segment 5: Hollywood Freeway north of Campo de Cahuenga Way -afternoon peak hour (northbound); and
Segment 10: SR 170 north of Magnolia Boulevard -afternoon peak hour (northbound).

(3) Neighborhood Intrusion Impacts

Proposed project design features and mitigation measures may reduce the Project’s significant neighborhood intrusion impacts to a less than significant level. However, as at this time it is not known whether consensus would be reached on the implementation of mitigation measures or if the agreed upon measures would reduce the impacts to less than significance [sic], to be
conservative, it is concluded that mitigation of the potential neighborhood intrusion impacts would not be feasible and a significant Project and cumulative traffic intrusion impact would remain.

(4) Project Access

Implementation of the identified mitigation measures would reduce impacts with regard to Project access. However, Project and cumulative impacts related to Project access would remain significant at the following two access locations:

1. Lankershim Boulevard and Campo de Cahuenga Way/Universal Hollywood Drive - both peak hours; and

2. Barham Boulevard and Lakeside Plaza Drive/Forest Lawn Drive - both peak hours.

(5) Supplemental Caltrans Analysis

Caltrans requested that the Project impact analysis include an evaluation of the Project’s potential effects on both on- and off-ramps, and on weaving/merging operations along those freeway segments to which the Project would add the most traffic. With the implementation of the
project design features and mitigation measures, Project impacts to on-and off-ramp locations would be reduced to less than **significant** levels; whereas weaving impacts would be reduced, but not to a less than **significant** level. No additional mitigation measures beyond those identified for on- and off-ramp and weaving impacts are required to address Project impacts. However, if Caltrans does not implement improvements to reduce impacts on the on-and off-ramps and freeway segments that would be affected by the Project, Project and cumulative on-and off-ramp and weaving impacts would remain **significant and unavoidable**. This conclusion also applies to the Project’s No Annexation scenario.

**Response to Comment No. 12-224**

The comment summarizes information from the Draft EIR regarding the significant and unavoidable impacts of the Project. Regarding freeway and on/off ramp impacts and mitigation, the commenter is referred to Response to Comment Nos. 12-5 and 12-152, above. Regarding significant and unavoidable impacts, the commenter is referred to Response to Comment No. 12-5, above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-225**

<table>
<thead>
<tr>
<th>2343</th>
<th>IV Summary of Significant and (2) Los Angeles County</th>
<th>All Neighborhood Intrusion mitigation measures must be</th>
</tr>
</thead>
</table>

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Page 786
### Unavoidable Impacts

<table>
<thead>
<tr>
<th>Segment</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Segment 1</td>
<td>Hollywood Freeway south of Alvarado Street - afternoon peak hour (southbound);</td>
</tr>
<tr>
<td>Segment 2</td>
<td>Hollywood Freeway south of Vermont Avenue - afternoon peak</td>
</tr>
<tr>
<td>Segment 3</td>
<td>Hollywood Freeway south of Santa Monica Boulevard - afternoon peak hour (southbound);</td>
</tr>
<tr>
<td>Segment 4</td>
<td>Hollywood Freeway south of Barham Boulevard - morning peak hour (northbound and southbound) and afternoon peak hour (southbound);</td>
</tr>
<tr>
<td>Segment 5</td>
<td>Hollywood Freeway north of Campo de Cahuenga Way - afternoon peak hour (northbound); and</td>
</tr>
<tr>
<td>Segment 10</td>
<td>SR 170 north of Magnolia Boulevard - afternoon peak hour (northbound).</td>
</tr>
</tbody>
</table>

(3) **Neighborhood Intrusion**

With implementation of the project design features and mitigation measures, **significant** Project and cumulative impacts would remain at the following seven freeway segments:

Segment 1: Hollywood Freeway south of Alvarado Street - afternoon peak hour (southbound);

Segment 2: Hollywood Freeway south of Vermont Avenue - afternoon peak

Segment 3: Hollywood Freeway south of Santa Monica Boulevard - afternoon peak hour (southbound);

Segment 4: Hollywood Freeway south of Barham Boulevard - morning peak hour (northbound and southbound) and afternoon peak hour (southbound);

Segment 5: Hollywood Freeway north of Campo de Cahuenga Way - afternoon peak hour (northbound); and

Segment 10: SR 170 north of Magnolia Boulevard - afternoon peak hour (northbound).

agreed upon in advance of any mitigation measures being approved. The Impacted Neighborhoods need to have a voice in the mitigation measures to be utilized and the list of neighborhoods impacted must include Studio City. Not only is the Island Neighborhood impacted, but Ventura Blvd from Lankershim to Tujunga as well as Lankershim Blvd South area to Wrightwood & Fruitland streets as well as Vineland south of Ventura.
### Impacts

Proposed project design features and mitigation measures may reduce the Project’s **significant** neighborhood intrusion impacts to a less than **significant** level. However, as at this time it is not known whether consensus would be reached on the implementation of mitigation measures or if the agreed upon measures would reduce the impacts to less than significance [sic], to be conservative, it is concluded that mitigation of the potential neighborhood intrusion impacts would not be feasible and a **significant** Project and cumulative traffic intrusion impact would remain.

#### (4) Project Access

Implementation of the identified mitigation measures would reduce impacts with regard to Project access. However, Project and cumulative impacts related to Project access would remain **significant** at the following two access locations:

1. Lankershim Boulevard and Campo de Cahuenga Way/Universal Hollywood Drive -both peak hours; and
2. Barham Boulevard and Lakeside Plaza Drive/Forest Lawn Drive - both peak hours.

(5) Supplemental Caltrans Analysis

Caltrans requested that the Project impact analysis include an evaluation of the Project’s potential effects on both on-and off-ramps, and on weaving/merging operations along those freeway segments to which the Project would add the most traffic. With the implementation of the project design features and mitigation measures, Project impacts to on-and off-ramp locations would be reduced to less than significant levels; whereas weaving impacts would be reduced, but not to a less than significant level. No additional mitigation measures beyond those identified for on- and off-ramp and weaving impacts are required to address Project impacts. However, if Caltrans does not implement improvements to reduce impacts on the on-and off-ramps and freeway segments that would be affected by the Project, Project and cumulative on-and off-ramp and weaving impacts would remain significant and unavoidable. This conclusion also applies to the Project’s
Response to Comment No. 12-225

The commenter is referred to Response to Comment No. 12-204 regarding determination of neighborhood intrusion impacts. See also Response to Comment Nos. 12-142 and 12-153 above and Topical Response No. 7: Neighborhood Intrusion (see Section III.C, Topical Responses, of this Final EIR). The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-226

<table>
<thead>
<tr>
<th>2343 – 2448</th>
<th>IV Summary of Significant and Unavoidable Impacts</th>
<th>(2) Los Angeles County Congestion Management Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>With implementation of the project design features and mitigation measures, <strong>significant</strong> Project and cumulative impacts would remain at the following seven freeway segments: Segment 1: Hollywood Freeway south of Alvarado Street -afternoon peak hour (southbound); Segment 2: Hollywood Freeway south of Vermont Avenue -afternoon peak</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Segment 3: Hollywood Freeway south of Santa Monica Boulevard -afternoon peak hour (southbound); Segment 4: Hollywood Freeway south of Barham Boulevard -morning peak hour</td>
<td>The budget for Neighborhood Intrusion Mitigation will not have a cap on its cost (as it does in the DEIR of $500,000), but rather will be fully funded by the applicant in agreement with the surrounding Neighborhoods.</td>
</tr>
</tbody>
</table>
(northbound and southbound) and afternoon peak hour (southbound);

Segment 5: Hollywood Freeway north of Campo de Cahuenga Way -afternoon peak hour (northbound); and

Segment 10: SR 170 north of Magnolia Boulevard - afternoon peak hour (northbound).

(3) Neighborhood Intrusion Impacts

Proposed project design features and mitigation measures may reduce the Project’s **significant** neighborhood intrusion impacts to a less than **significant** level. However, as at this time it is not known whether consensus would be reached on the implementation of mitigation measures or if the agreed upon measures would reduce the impacts to less than significance [sic], to be conservative, it is concluded that mitigation of the potential neighborhood intrusion impacts would not be feasible and a **significant** Project and cumulative traffic intrusion impact would remain.

(4) Project Access
Implementation of the identified mitigation measures would reduce impacts with regard to Project access. However, Project and cumulative impacts related to Project access would remain **significant** at the following two access locations:

1. Lankershim Boulevard and Campo de Cahuenga Way/Universal Hollywood Drive -both peak hours; and

2. Barham Boulevard and Lakeside Plaza Drive/Forest Lawn Drive -both peak hours.

(5) Supplemental Caltrans Analysis

Caltrans requested that the Project impact analysis include an evaluation of the Project’s potential effects on both on-and off-ramps, and on weaving/merging operations along those freeway segments to which the Project would add the most traffic. With the implementation of the project design features and mitigation measures, Project impacts to on-and off-ramp locations would be reduced to less than **significant** levels; whereas weaving impacts would be reduced, but not to a less than **significant** level. No additional mitigation measures
beyond those identified for on-
and off-ramp and weaving
impacts are required to
address Project impacts.
However, if Caltrans does not
implement improvements to
reduce impacts on the on-and
off-ramps and freeway
segments that would be
affected by the Project,
Project and cumulative on-and
off-ramp and weaving impacts
would remain significant and
unavoidable. This conclusion
also applies to the Project’s
No Annexation scenario.

Response to Comment No. 12-226

As explained in the Los Angeles Department of Transportation’s Neighborhood Traffic Management Process included as Appendix T to the Transportation Study (Appendix E-1 to the Draft EIR), “[b]ased on its experience implementing Transportation Management Plans, LADOT has determined that a budget of up to $500,000 is appropriate for the development of Neighborhood Transportation Management Plan(s) for the eligible neighborhoods....” As described in Mitigation Measure B-42 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, (Mitigation Measure B-45 in the Final EIR) the Applicant or its successor shall provide funding pursuant to a mechanism reasonably acceptable to the City of Los Angeles Department of Transportation in an amount up to $500,000 for implementing the City of Los Angeles Department of Transportation’s Neighborhood Traffic Management Plan process for the Project set forth in Appendix E-1 to the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
### Comment No. 12-227

<table>
<thead>
<tr>
<th>2343 – 2448</th>
<th>IV Summary of Significant and Unavoidable Impacts</th>
<th>(2) <em>Los Angeles County Congestion Management Plan</em></th>
<th>The applicant must be responsible for any freeway and/or on &amp; off ramp mitigation to include weaving and shall not rely on CalTrans [sic] for any financial participation.</th>
</tr>
</thead>
<tbody>
<tr>
<td>(2) Los Angeles County Congestion Management Plan</td>
<td>With implementation of the project design features and mitigation measures, <strong>significant</strong> Project and cumulative impacts would remain at the following seven freeway segments:</td>
<td>If the applicant cannot reduce the impacts of freeway weaving and on and off ramp impaction, the applicant must scale back the project to a point that the freeway system, including on and off ramps can handle.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Segment 1: Hollywood Freeway south of Alvarado Street -afternoon peak hour (southbound);</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td>Segment 2: Hollywood Freeway south of Vermont Avenue -afternoon peak</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Segment 3: Hollywood Freeway south of Santa Monica Boulevard -afternoon peak hour (southbound);</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Segment 4: Hollywood Freeway south of Barham Boulevard -morning peak hour (northbound and southbound) and afternoon peak hour (southbound);</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Segment 5: Hollywood Freeway north of Campo de Cahuenga Way -afternoon peak hour (northbound); and</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Segment 10: SR 170 north of Magnolia Boulevard -afternoon peak hour</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
(3) Neighborhood Intrusion Impacts

Proposed project design features and mitigation measures may reduce the Project’s significant neighborhood intrusion impacts to a less than significant level. However, as at this time it is not known whether consensus would be reached on the implementation of mitigation measures or if the agreed upon measures would reduce the impacts to less than significance [sic], to be conservative, it is concluded that mitigation of the potential neighborhood intrusion impacts would not be feasible and a significant Project and cumulative traffic intrusion impact would remain.

(4) Project Access

Implementation of the identified mitigation measures would reduce impacts with regard to Project access. However, Project and cumulative impacts related to Project access would remain significant at the following two access locations:

1. Lankershim Boulevard and Campo de Cahuenga
Way/Universal Hollywood Drive - both peak hours; and

2. Barham Boulevard and Lakeside Plaza Drive/Forest Lawn Drive - both peak hours.

(5) Supplemental Caltrans Analysis

Caltrans requested that the Project impact analysis include an evaluation of the Project’s potential effects on both on-and off-ramps, and on weaving/merging operations along those freeway segments to which the Project would add the most traffic. With the implementation of the project design features and mitigation measures, Project impacts to on-and off-ramp locations would be reduced to less than significant levels; whereas weaving impacts would be reduced, but not to a less than significant level. No additional mitigation measures beyond those identified for on-and off-ramp and weaving impacts are required to address Project impacts. However, if Caltrans does not implement improvements to reduce impacts on the on-and off-ramps and freeway segments that would be affected by the Project, Project and cumulative on-and off-ramp and weaving impacts
would remain **significant and unavoidable**. This conclusion also applies to the Project’s No Annexation scenario.

**Response to Comment No. 12-227**

As noted on page 654 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, Caltrans requested that the project impact analysis include an evaluation of the Project’s potential effects on on- and off-ramps, freeway segments, and on weaving/merging operations along freeway segments to which the Project would add the most traffic. This analysis is not a requirement of the City under the City’s CEQA Thresholds Guide. The requested Caltrans analysis is described on pages 654–655 of the Draft EIR. Based on the requested supplemental Caltrans analysis, Mitigation Measures B-43 and B-44 were included in the Draft EIR (Mitigation Measures B-46 and B-47 in the Final EIR) and provide for a fair-share contribution as determined by Caltrans toward any improvements to the study on- and off-ramps and freeway segments that would mitigate the Project’s impacts and that are implemented by the year 2030. As explained on page 694 of the Draft EIR, with the implementation of the mitigation measures, Project impacts to on- and off-ramp locations would be reduced to less than significant levels, whereas weaving impacts would be reduced, but not to a less than significant level. Further, if Caltrans does not implement improvements to reduce impacts on the on- and off-ramps and freeway segments that would be affected by the Project, the impacts could remain significant and unavoidable. As noted in Comment Letter No. 14 included in this Final EIR, Caltrans concurs with the proposed traffic methodology, modeling, and impact assessment contained with the Draft EIR Transportation Study. Also, Caltrans acknowledges that the proposed mitigation measures would address the impacts of the Project with certain modifications/clarifications noted on the letter which did not relate to on- and off-ramps or weaving. The commenter is also referred to Response to Comment No. 12-5 with regard to significant and unavoidable impacts. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-228**

<table>
<thead>
<tr>
<th>636</th>
<th>File IV.B.1 Traffic / Access – Traffic/Circulation</th>
<th>The Ventura/Cahuenga Boulevard Corridor Specific Plan prohibits hauling on Cahuenga or Ventura Blvds.</th>
</tr>
</thead>
<tbody>
<tr>
<td>2. Option I -The haul trucks exiting the Project Site would head west on Buddy Holly Drive and then south on Universal Studios Boulevard,</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**City of Los Angeles**

Final Environmental Impact Report

NBC Universal Evolution Plan

July 2012
| 636 | Paragraph 4 | The projected level of haul truck traffic, in conjunction with the mitigation measures proposed below, is not expected to result in a **significant** traffic impact. With regard to haul truck traffic, outside of the peak hours, the projected level of haul-truck traffic would not adversely affect street operations because of the reduced levels of traffic volumes present during these times. The proposed routes would utilize Forest Lawn Drive, Cahuenga Boulevard (West), Universal Studios Boulevard, and/or Buddy Holly Drive to access the freeways. Forest Lawn Drive and Cahuenga Boulevard (West) are classified as Major Highway Class II in the City of Los Angeles. | The Ventura/Cahuenga Boulevard Corridor Specific Plan prohibits hauling on Cahuenga or Ventura Blvds. |
Angeles’ General Circulation Plan and are designed to accommodate the projected level of truck traffic.

**Response to Comment No. 12-228**

This comment is similar to Comment No. 12-202. Please refer to Response to Comment No. 12-202.

**Comment No. 12-229**

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<table>
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<tr>
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</thead>
<tbody>
<tr>
<td>636</td>
<td>Paragraph 4</td>
<td>The projected level of haul truck traffic, in conjunction with the mitigation measures proposed below, is not expected to result in a significant traffic impact. With regard to haul truck traffic, outside of the peak hours, the projected level of haul-truck traffic would not adversely affect street operations because of the reduced levels of traffic volumes present during these times. The proposed routes would utilize Forest Lawn Drive, Cahuenga Boulevard (West), Universal Studios Boulevard, and/or Buddy Holly Drive to access the freeways. Forest Lawn Drive and Cahuenga Boulevard (West) are classified as Major Highway Class II in the City of Los Angeles’ General Circulation Plan and are designed to accommodate the projected level of truck traffic. Hauling is prohibited during peak traffic hours.</td>
</tr>
</tbody>
</table>
Response to Comment No. 12-229

The comment appears to request that Project hauling be prohibited during peak traffic hours. Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR analyzes potential traffic impacts from Project construction, including hauling. Pursuant to Mitigation Measure B-41, “the Project Applicant or its successor shall prepare construction traffic management plans, including but not limited to street closure information, detour plans, haul routes, and staging plans satisfactory to the affected jurisdiction. The plans shall be based on the nature and timing of the specific construction and other projects in the vicinity of the Project Site and shall include various elements, including, for example, provisions for temporary traffic control to improve traffic flow on public roadways and scheduling construction activities to reduce the effect on traffic flow on public roadways.” The commenter is also referred to Response to Comment No. 12-200, above.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-230

<table>
<thead>
<tr>
<th>733 – 737</th>
<th>Table 17 Traffic &amp; Circulation</th>
<th>Analyzed Intersections SEE ATTACHMENT #1</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Of the 164 Intersections analyzed, 34 of them are in Studio City and 3 others are within one block of Studio City, thus their impact will affect Studio City. However, Studio City is not listed as an Impacted Neighborhood. There is no way that any mitigation can take place at these intersections without neighborhood impaction in Studio City. Studio City must be included as an Impacted Neighborhood and the amount of funds that are earmarked for Neighborhood Impaction must be increased.</td>
</tr>
</tbody>
</table>
Response to Comment No. 12-230

The commenter seems to confuse intersection impacts and neighborhood intrusion impacts. Intersection impacts are described by intersection, whereas neighborhood intrusion impacts are described by the neighborhoods in which the “cut-through” traffic may occur. The commenter is referred to Response to Comment Nos. 12-142 and 12-157, above, and Topical Response No. 7: Neighborhood Intrusion (see Section III.C, Topical Responses, of this Final EIR), for details on neighborhood intrusion impacts. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-231

<table>
<thead>
<tr>
<th>733 – 737</th>
<th>Table 17 Traffic &amp; Circulation</th>
<th>Analyzed Intersections</th>
<th>The Intersections in Studio City are as follows: #'s 1, 4, 5, 7, 14, 22, 23, 34-38, 72, 73, 108, 110-117, 144-149, 151, 157, 160 and 161. Many of these intersections are already rated at D-F and with growth projections will be worse by the project completion date of 2030. Additionally, some of these intersections AFTER MITIGATION will still be rated D-F, which is not acceptable. The project must be scaled back so that no significant impact of these intersections remains after mitigation. The 3 intersections near Studio City that have tremendous impact to Studio City are #’s 11, 109 &amp; 158. The same conditions apply as the 34 intersections in Studio City and the same unacceptable significant impact cannot occur.</th>
</tr>
</thead>
<tbody>
<tr>
<td>SEE ATTACHMENT #1</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Response to Comment No. 12-231

The comment refers to the table included as an attachment to the comment letter (see Comment No. 12-387). The referenced table is a copy of Table 17, page 133, of the Draft EIR, which is a list of intersections analyzed in the Transportation Study. As shown in Table 39 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, with the implementation of the identified mitigation measures, the Project does not result in a significant and unavoidable impact at nearly all of the intersections listed. Specifically, Project impacts would be less than significant at Intersections 1, 4, 5, 7, 11, 14, 34, 37, 38, 72, 108-117, 144-149, 151, 157, 158, 160, and 161. As explained on pages 690–691 of the Draft EIR, with implementation of the identified mitigation measures, significant and unavoidable impacts would remain at nine intersections including Intersection Nos. 22, 23, 35, 36, and 73 identified in the comment. Regarding significant and unavoidable impacts, the commenter is referred to Response to Comment No. 12-5, above.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-232**

| 738 – 746 | Table 18 | Level of Service Definitions for Signalized Intersections (Critical Movement Analysis Method) SEE ATTACHMENT [sic] 2 & Level of Service Definitions for Unsignalized Intersections (2000 Highway Capacity Manual Unsignalized Method) SEE ATTACHMENT 2 Existing Conditions Intersection Peak Hour Levels of Service SEE ATTACHMENT 3 | Table 18 & 19 show the rating system for intersections. This information is necessary to understand the intersection and freeway ratings in the tables to follow. |
| 738 | Table 19 |
| 739 - 746 | Table 20 |
### Response to Comment No. 12-232

The comment refers to the tables included as attachments 2 and 3 to the comment letter (see Comment Nos. 12-388 and 12-389). The referenced tables are a copy of Tables 18 and 19, page 738, from Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR. Table 18 lists the Level of Service definitions for signalized intersections (critical movement analysis method) used in the Transportation Study, and Table 19 lists the Level of Service definition for unsignalized intersections (2000 Highway Capacity Manual unsignalized methodology) used in the Transportation Study.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

### Comment No. 12-233

| 738 – 746 | Table 18 | Level of Service Definitions for Signalized Intersections (Critical Movement Analysis Method) SEE ATTACHMENT 2 & Level of Service Definitions for Unsignalized Intersections (2000 Highway Capacity Manual Unsignalized Method) SEE ATTACHMENT 2 | Table 20: Of the 34 analyzed intersections in Studio City 6 are rated D-F with currently existing conditions, without growth calculated in. The data this is based on was gathered in 2007. 600 housing units have been completed in Studio City since that data was gathered, thus the ratings are likely incorrect. Those intersections are #’s 11, 14, 111, 115, 146, and 149. Many of these intersections even with mitigation will not improve. It also should be noted that just because an intersection already has a poor rating (D-F) does not mean that the increased traffic caused by the Project will not add to the congestion of the intersection and add to Neighborhood Impaction. |
| 738 | Table 19 | Existing Conditions Intersection Peak Hour Levels of Service SEE ATTACHMENT 3 | |
| 739 – 746 | Table 20 | | |
## Table 21 Future with Project Funded Improvements Conditions (Year 2030)

SEE ATTACHMENT 4

Table 21 shows the ratings of Arterial Monitoring Stations. Station #38 (Lankershim Blvd & Ventura Blvd/Cahuenga Blvd) is currently rated D am & C pm. and will degrade to E am & E pm.

Station # 115 (Laurel Canyon Blvd & Ventura Blvd) is currently Rated E am & E pm. and will degrade to F am & F pm. with the Project, including the TDM & funded improvements. If all the calculations are correct and the future planned developments does not exceed projections. Additionally, the traffic data is dated 2007 and does not reflect current traffic data. There is no way these calculations and ratings are correct.

### Response to Comment No. 12-233

With regard to the referenced tables, see Response to Comment No. 12-232, above. Regarding traffic count data and housing units in Studio City, as noted in Response to Comment No. 12-145, above, the future traffic volumes were derived from the Universal City Transportation Model, and the existing traffic volumes were used for validation purposes only. Further, the Project’s impact has been determined on future conditions that include traffic from the 256 related projects and other growth included in the SCAG regional transportation model. As shown in Table 39 on page 802 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, with implementation of the identified mitigation measures, the Project does not result in a significant and unavoidable impact at Intersections 11, 14, 111, 115, 146, and 149. As discussed on page 692 of the Draft EIR, with implementation of the project design features and mitigation measures, the Project’s significant impacts on Los Angeles Congestion Management Plan arterial monitoring stations would be less than significant. With regard to neighborhood intrusion traffic, the
commenter is referred to Response to Comment No. 12-142 and Topical Response No. 7: Neighborhood Intrusion (see Section III.C, Topical Responses, of this Final EIR).

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-234**

| 747 | Table 21 | Future with Project Funded Improvements Conditions (Year 2030) | It is unacceptable to degrade intersections to an F rating with the TDM and Funded Improvements. The Project must be scaled back as to not cause these intersections to degrade to the projected levels. |

**Response to Comment No. 12-234**

The comment refers to the table included as an attachment to the comment letter (see Comment No. 12-390). The table is a copy of Table 21, page 747, of the Draft EIR, which lists the Future with Project with Funded Improvements Conditions of the CMP Arterial Monitoring Stations. As noted in the table, the Future with Project with Funded Improvement Conditions at the Arterial Monitoring Stations does not result in a significant impact, based on the applicable criteria, and in many cases, the conditions are improved as compared to the Future Without Project Conditions.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-235**

| 748 | Table 22 | Levels of Service Definitions for Freeway Segments | Table 22 shows the rating system for freeway segments. This information is necessary to understand the intersection and freeway ratings in the tables to follow. |

| SEE ATTACHMENT 4 | SEE ATTACHMENT 5 |
### Response to Comment No. 12-235

The comment refers to the table included as an attachment to the comment letter (see Comment No. 12-391). The referenced table is a copy of Table 22, page 748, of the Draft EIR, which identifies the Level of Service definitions for freeway segment analysis in the Transportation Study. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

### Comment No. 12-236

| 749 – 750 | Table 23 | Existing Conditions – Freeway Segments Peak Hour Levels of Service | Freeway Segment #5 (US 101 north of Campo de Cahuenga Way) is currently rated C in the am peak hours in the North bound direction and E in the South bound direction. In the pm peak hours it is rated E & D. This freeway segment is already impacted without the Project, and it feeds traffic directly into the main entrances of the Project.

Freeway Segment #6 (US 101 east of Coldwater Canyon Ave. is currently rated D in the North bound direction and E in the South bound direction during the am peak hours. During the peak pm hours is rated F(0) in the North bound direction and E in the South bound direction.

This freeway segment is already extremely impacted and also feeds traffic directly into and out of the Project. The existing F(0) rating in the North bound in the pm peak hours is a night mare scenario when the office building section of the Project leaves work. There is

| SEE ATTACHMENT 6 |
no way this segment will circulate traffic in an efficient manner. This alone shows that the Project must be scaled back.

<p>| | | |</p>
<table>
<thead>
<tr>
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</thead>
<tbody>
<tr>
<td>749 – 750</td>
<td>Table 23</td>
<td>Existing Conditions -Freeway Segments Peak Hour Levels of Service -Continued</td>
</tr>
<tr>
<td></td>
<td></td>
<td>SEE ATTACHMENT 6</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Freeway Segment #7 (US 101 East of the 405) is currently rated C in the North Bound direction and D in the South bound direction in the am peak hours and D in both the North and South bound directions in the pm peak hours.</td>
</tr>
</tbody>
</table>

**Response to Comment No. 12-236**

The comment refers to the table included as an attachment to the comment letter (see Comment No. 12-392). The referenced table is a copy of Table 23, page 749, of the Draft EIR, which lists the existing conditions of the freeway segments analyzed in the Transportation Study. As stated in the *Los Angeles CEQA Thresholds Guide* and the Los Angeles County Congestion Management Program (CMP), the Project results in a significant impact at freeway segments based on the incremental Project traffic at a particular segment and the operating conditions of that location. Therefore, the Project does not result in a significant impact at a segment merely because it is operating at Level of Service E or F under existing conditions. As stated in Section IV.B.1.3.b.(2)(b), Traffic/Access – Traffic/Circulation, of the Draft EIR and Chapters I and VI of the Transportation Study:

“For Los Angeles County Congestion Management Program freeway segments, a project would normally have a significant freeway segment impact if project traffic causes an increase in the V/C ratio on a freeway segment or freeway on- or off-ramp of two percent or more capacity (V/C increase >0.02), which causes or worsens Level of Service F conditions (V/C >1.00).”

Since the traffic analyses presented in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR and the Transportation Study utilize the above-noted significant impact criteria for freeway segments, the analysis conforms with standard CMP and *Los Angeles CEQA Thresholds Guide* policies and procedures.
The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-237**

<table>
<thead>
<tr>
<th>756 - 769</th>
<th>Table 25</th>
<th>Trip Generation Estimates for Proposed Projects</th>
<th>Table 25 shows all of the related projects that could affect the generated traffic in areas that will also affect the Project. The total number of projects is 256 totaling with a total of Trip Generations of 335,184 calculated by the applicant, though many of the proposed projects do not have trip generation estimates. Therefore, this number is a complete guess, though it is a given that the total trip generation number used by the applicant is on the low side and probably very low. Some of these projects are approved and some (most) are proposed. Although these projects are in the San Fernando Valley and on the West side, the 164 intersections studied are in the San Fernando Valley and on the west side as well, thus any project that affects any of the studied intersections or freeway segments affects the traffic and circulation for the Project.</th>
</tr>
</thead>
</table>

**Response to Comment No. 12-237**

This comment refers to the table included as an attachment to the comment letter (see Comment No. 12-393). The table appears to be a copy of Table 26, pages 756–769, of the Draft EIR, which lists the trip generation estimates for the related projects. As noted
in Section IV.B.1.2.c.(2), Traffic/Access – Traffic/Circulation, of the Draft EIR, a total of 256 related projects within the 50-square-mile study area were compiled based on information provided by the City of Los Angeles, City of Burbank, and City of West Hollywood. These related projects include planned or proposed developments that were provided by the individual jurisdictions. As shown on Figure 52 and Table 26 in Section IV.B.1 of the Draft EIR, traffic from these related projects has been included in all of the future traffic volume projections. The Project’s impact has been determined based on future conditions that include traffic from the 256 related projects and other growth included in the Southern California Association of Government’s regional transportation model. For related projects for which traffic studies have been prepared, the trip-generation characteristics from those studies were used. The trip-generation characteristics of the remaining related projects was reviewed and approved by the Los Angeles Department of Transportation and represent a fair and reasonable characterization of the likely trip generation from each of these related projects. With regard to the specific related projects for which no estimated trips were identified, it was determined that the trips from these projects would be covered in the background traffic growth assumed in the SCAG regional model.

With regard to haul truck traffic, as described in Section IV.B.1.3.d.(4)(b) of the Draft EIR, the projected level of haul truck traffic, in conjunction with the mitigation measures proposed in Mitigation Measure B-41 in Section IV.B.1 of the Draft EIR, is not expected to result in a significant traffic impact. The haul truck routes (shown in Figure 72 in Section IV.B.1 of the Draft EIR) were selected based on a thorough examination of streets serving the Project Site to ensure that trucks were not assigned to local streets and that minimum travel is required on any collector streets. The proposed haul truck routes would utilize Lankershim Boulevard, Forest Lawn Drive, Cahuenga Boulevard (West), Universal Studios Boulevard, and/or Buddy Holly Drive to access the freeways. Lankershim Boulevard, Forest Lawn Drive, and Cahuenga Boulevard (West) are classified as Major Highway Class II in the City of Los Angeles’ General Plan and are designed to accommodate the projected level of truck traffic.

In addition, as described in Mitigation Measure B-41 in Section IV.B.1 of the Draft EIR, the Project Applicant or its successors would prepare detailed construction traffic management plans, including street closure information, detour plans, haul routes, and staging plans satisfactory to the affected jurisdictions. The construction traffic management plans shall be based on the nature and timing of the specific construction and other projects in the vicinity of the Project Site and include numerous elements to ensure minimum impact on the street system and the surrounding community. It should also be noted that construction impacts are temporary impacts.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment No. 12-238

756 – 769  Table 25  Trip Generation Estimates for Proposed Projects -Continued
SEE ATTACHMENT 7

We have only studied the projects that affect the Studio City area and the Ventura/Cahuenga pass. There are 67 projects that affect the area outlined above. 61 of those have a total of 111,357 estimated trips generated. That number of trips generated from the Project in the area described above will have a huge negative impact on Studio City. In addition, there are 6 proposed projects in the area above that do not have estimated trips generated, so the total trips generated number is low. The project must be scaled back in order to accommodate the street and freeway infrastructure.

Response to Comment No. 12-238

With regard to the referenced attachment, the commenter is referred to Response to Comment No. 12-237, above. The Project’s traffic analysis has been determined on future conditions that include traffic from the 256 related projects and other growth included in the Southern California Association of Government’s regional transportation model. See Section IV.B.1.2.c.(1) of the Draft EIR regarding inclusion of the related projects in the traffic model.

Contrary to the implication in the comment, the trips from the related projects are not generated by the Project. The related project trips are projected to be generated by the related projects independent of the Project. With regard to the specific related projects for which no estimated trips were identified, it was determined that the trips from these projects would be covered in the background traffic growth assumed in the SCAG regional model.
The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-239**

| 772 - 778 | Table 28 | Future Without Projects Conditions (Year 2030) Intersection Park Hour Levels of Service SEE ATTACHMENT 8 |
| Table 28 | Future Without Projects Conditions (Year 2030) Intersection Park Hour Levels of Service -Continued SEE ATTACHMENT 8 |
| Table 28 | Future Without Projects Conditions (Year 2030) Intersection Park Hour Levels of Service |
| 772 – 778 | Table 28 | Table 28 shows the future (Year 2030 -completion date of the project) ratings in the am & pm of 164 Intersections. 30 of those intersections affect Studio City. Of those 30 intersections the projected ratings for the am peak hours are: 2 Rated D, 3 Rated E and 7 Rated F. Of those intersections the projected pm peak hours are: 4 Rated D, 3 Rated E and 9 Rated F. |
| Table 28 | Keeping in mind that the traffic data was gathered in 2007 and that Studio City has completed 600 additional housing units since then it is safe to say that these figures are incorrect (lower traffic data than actual) and that the projections are not valid and in fact, the impact will be greater than estimated. |

**Response to Comment No. 12-239**

The comment refers to the table included as an attachment to the comment letter (see Comment No. 12-394). The referenced table is a copy of Table 28, pages 772–778, of the Draft EIR, which is a list of the intersection levels of service for the analyzed intersections under the Future Without Project Conditions. In other words, the table lists the level of service that would occur at the identified intersections in the future if the Project
is not developed. Regarding traffic count data and housing units in Studio City, the commenter is referred to Response to Comment No. 12-233, above.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-240**

| 772 – 778 | Table 28 | Future Without Projects Conditions (Year 2030) Intersection Park Hour Levels of Service -Continued SEE ATTACHMENT 8 | As shown in previously presented charts (and more later on) the projects [sic] size makes the mitigations useless in many instances. The Project must be scaled back to accommodate the traffic infrastructure. |

**Response to Comment No. 12-240**

With regard to the referenced attachment, the commenter is referred to Response to Comment No. 12-239, above. The Project’s transportation improvement and mitigation program has been reviewed and approved by the Los Angeles Department of Transportation. The improvements were identified to mitigate the Project’s impacts, to the extent feasible. With regard to intersection impacts, as shown in Table 39 on pages 802–812 of the Draft EIR and discussed on pages 690–691 of the Draft EIR, with implementation of the identified mitigation measures, significant and unavoidable impacts would remain at nine intersections. Also of note is that implementation of the proposed intersection improvements results in improved future traffic conditions with Project development compared to future conditions without Project development at many locations. Regarding significant and unavoidable impacts, the commenter is referred to Response to Comment No. 12-5, above. Refer to Response to Comment No.12-12 regarding alternatives that were analyzed that include less development than the proposed Project.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-241**

<p>| 779 | Table 29 | Future Without Project Conditions (Year 2030) Freeway Segments Peak | This table shows that the following Freeway Segments will be severely impacted by the |</p>
<table>
<thead>
<tr>
<th>Hour Levels of Service</th>
<th>completion year of the Project without project conditions:</th>
</tr>
</thead>
<tbody>
<tr>
<td>SEE ATTACHMENT 9</td>
<td>Segment #5 (US 101 north of Campo de Cahuenga Way) will be rated D in the am North bound and F(o) in the am Southbound. The rating for the pm peak hours is F(o) north bound and D South bound.</td>
</tr>
<tr>
<td></td>
<td>Segment #6 (US 101 east of Coldwater Canyon Ave) am rating north bound is D and south bound is F(o), the pm ratings are F(o) north bound and F south bound.</td>
</tr>
<tr>
<td>779 Table 29</td>
<td>Segment #7 (US 101 east of I 405) the am rating is D North bound and E South bound. The pm ratings are F North bound and D South bound.</td>
</tr>
<tr>
<td>Future Without Project Conditions (Year 2030) Freeway Segments Peak Hour Levels of Service - Continued</td>
<td>These ratings show that the freeway system as it is, cannot handle additional traffic generated by the size of the Project. Additionally, as mentioned previously, the data the above ratings were based on is from 2007, prior to the completion of 600 additional housing units in Studio City, most of which will figure into the above freeway segments. The Project must be scaled down, even with the planned mitigation measures, to accommodate the freeway infrastructure.</td>
</tr>
<tr>
<td>SEE ATTACHMENT 9</td>
<td></td>
</tr>
</tbody>
</table>
Response to Comment No. 12-241

The comment refers to the tables included as an attachment to the comment letter (see Comment No. 12-395). The referenced table is a copy of Table 29, page 779, of the Draft EIR, which lists the freeway segment conditions at the analyzed freeway segments under the Future Without Project Conditions. In other words, the table lists the conditions that would occur in the freeway segments in the future if the Project is not developed. With regard to Project freeway segment impacts, as discussed on page 692 of the Draft EIR, with implementation of the project design features and mitigation measures, significant impacts would remain at six freeway segments. Regarding traffic count data and housing units in Studio City, the commenter is referred to Response to Comment No. 12-233, above. Regarding significant and unavoidable impacts, the commenter is referred to Response to Comment No. 12-5, above.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-242

| 780 - 781 | Table 30 | Project Site Trip Generation - Before TDM Trip Reduction SEE ATTACHMENT 10 | This table shows 4,175,971 trips generated with the existing site plus Interim Developments, and 5,730,923 trips generated after build out. That is an increase of 1,554,952. This number of trips generated is impossible to handle even with the mitigation measures planned. |

Response to Comment No. 12-242

The comment refers to the table included as an attachment to the comment letter (see Comment No. 12-396). The referenced table is a copy of Table 30, page 780–781, of the Draft EIR, which lists the Project’s trip generation before trip reductions from the proposed Transportation Demand Management Program. The comment incorrectly refers to the square footage of development for the proposed Project as trips. As shown in Table 36 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, the Project would generate a net total of 28,108 daily trips on a typical weekday, accounting for the
Transportation Demand Management credit. The impacts from the Project trips are analyzed in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-243**

| 801 | Table 38 | Access Impact Analysis - Operational SEE ATTACHMENT 11 | This table shows that many of the 164 intersections studied are more severely impacted even after the Project has instituted the TDM and future Funded Improvements. In particular intersection #36 (Lankershim Blvd / Campo de Cahuenga Way/Universal Hollywood Dr. It goes from an A in both the am and pm to an F in both the am & pm. Intersection #53 (Barham Blvd & Lakeside Plaza Dr/Forrest Lawn Dr degrades to an F rating in both am and pm peak hours and this is the point that the proposed north south road will be placed to serve as an entry to the residential portion of the Project. |

**Response to Comment No. 12-243**

The comment refers to the tables included as an attachment to the comment letter (see Comment No. 12-397). The table is a copy of Table 38, page 801, of the Draft EIR, which lists the conditions at the Project access intersection. The comment incorrectly refers to the intersection of Barham Boulevard & Lakeside Plaza Drive/Forest Lawn Drive as Intersection No. 53. The Barham Boulevard & Lakeside Plaza Drive/Forest Lawn Drive Intersection is Intersection No. 55.
The comment incorrectly states that the Project degrades the traffic operations at the intersections of Lankershim Boulevard & Campo de Cahuenga Way/Universal Hollywood Drive (Intersection 36) and Barham Boulevard & Lakeside Plaza Drive/Forest Lawn Drive (Intersection 53) to Level of Service F. As shown in Table 38 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, both intersections are projected to operate at Level of Service F even under Future without Project conditions, without the addition of Project traffic. The Project’s mitigation program includes all feasible mitigation measures to improve the operating conditions of these intersections. As shown in Table 38 in Section IV.B.1 of the Draft EIR, the volume to capacity ratio (V/C) at the intersection of Lankershim & Campo de Cahuenga Way/Universal Hollywood Drive in the P.M. peak hour and at Barham Boulevard & Lakeside Plaza Drive/Forest Lawn Drive in the A.M. and P.M. peak hour under the Future with Project with Funded Improvements (project design features and mitigation measures) scenario is lower (better) than that projected under the Future without Project scenario. Regarding significant and unavoidable impacts, the commenter is referred to Response to Comment No. 12-5, above.

**Comment No. 12-244**

| 802 – 812 | Table 39 | Future With Project With Funded Improvements Conditions (Year 2030) Intersection Peak Hour Levels of Service -Signalized Intersections SEE ATTACHMENT 12 | This table shows which intersections show Residual Significant Impacts and which mitigation measures are shared with the Metro Project (also referred to as Project 65 in this DEIR). The intersections that show a Residual Significant Impact are: Intersection #22 (US 101 North Bound Ramps & Campo de Cahuenga Way) Intersection #23 (Metro Driveway & Campo de Cahuenga Way) Intersection # 35 (Lankershim Blvd & Main Street and Intersection #36 (Lankershim Blvd & Campo de Cahuenga Way/Universal Hollywood Dr.) All of these intersections are... |
SEE ATTACHMENT 12

located at the western main entrance of the project. Traffic from the hotels, theme park, City Walk and some of the office space including the shuttle connections all begin and end here. In addition, the bike path ends here and the Metro Station is directly across the street. This is extremely dangerous and will impact the Island Neighborhood, Campo De Cahuenga and the Metro Station all of which are in Studio City as well as the intersection of Ventura and Lankershim, which is already severely impacted. The Project must be scaled back. These intersections alone will make the access to the freeway and Ventura Blvd, as well as the Project impassible.

**Response to Comment No. 12-244**

The comment refers to the table included as an attachment to the comment letter (see Comment No. 12-398). The referenced table is a copy of Table 39, page 802–811, of the Draft EIR, which lists conditions at signalized intersections under future conditions without, as well as with, the Project, inclusive of project design features and mitigation measures. As discussed on page 690 of the Draft EIR, with implementation of the project design features and mitigation measures, significant impacts remain at nine intersections, including Intersections 22, 23, 35, and 36 referenced in the comment. Regarding significant and unavoidable impacts, the commenter is referred to Response to Comment No. 12-5, above. Regarding the proposed bike path as discussed on page 653 of the Draft EIR, the proposed bike path configuration would be subject to the review and approval of the City Bureau of Engineering, City of Los Angeles Department of Transportation and the County of Los Angeles Department of Public Works. All intersections along the proposed bike path shall have appropriate controls approved by the Los Angeles Department of
Transportation. The proposed bike path would also be enhanced with improved crosswalks and landscaping buffers where feasible. Further, all new driveway locations from city streets would be required to conform with City standards and would be required to provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls. Signalization meeting City standards would be provided at the Project access locations requiring signalization to provide for proper vehicular and bicycle movement controls. Thus, the Project would not substantially increase hazards to pedestrians, bicyclists, or vehicles and a less than significant impact would occur.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-245**

| 802 – 812 | Table 39 | Future With Project With Funded Improvements Conditions (Year 2030) Intersection Peak Hour Levels of Service - Signalized Intersections – Continued SEE ATTACHMENT 12 | The number of mitigation measures shared with the Metro Project total 32 intersections. There is no way of knowing if and when the Metro Project will ever be started let alone completed and what the Project will entail if it gets started. The applicant can not [sic] count on the Metro Project to share any mitigation measures and must fully fund all street and freeway mitigations without the possibility of sharing mitigation costs with the Metro Project or any other proposed project in the area. |

**Response to Comment No. 12-245**

With regard to the referenced attachment, the commenter is referred to Response to Comment No. 12-244, above. Regarding the sharing of mitigation measures, the commenter is referred to Response to Comment Nos. 12-14 and 12-162, above.
The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-246**

| 802 – 812 | Table 39 | Future With Project With Funded Improvements Conditions (Year 2030) Intersection Peak Hour Levels of Service - Signalized Intersections – Continued SEE ATTACHMENT 12 | In fact the shared mitigation measures proposed for the Metro Project leave unavoidable impacts before adding the impact from the Project. |

**Response to Comment No. 12-246**

With regard to the referenced attachment, the commenter is referred to Response to Comment No. 12-244, above. Regarding significant impacts, the commenter is referred to Response to Comment No. 12-5, above. Regarding the sharing of mitigation measures, the commenter is referred to Response to Comment Nos. 12-14 and 12-162, above.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-247**

| 813 – 815 | Table 40 | Future Project With Funded Improvements Conditions (Year 2030), Los Angeles CEQA Thresholds Guide Methodology - Intersection Peak Hour Levels of Service - Unsignalized Intersections SEE ATTACHMENT 13 | This table shows that 3 additional unsignalized intersections are planned to be share [sic] with the Metro Project. Four intersections are listed as shared: Intersection #32 Cahuenga Blvd & Valley Spring Way; Intersection #72 Lankershim Blvd & Muddy Waters Dr.; Intersection # 73 Lankershim Blvd and Jimi Henndrix [sic] Dr.; Intersection # 159 US 101 South Bound Off Ramp & Riverside Dr. |
### Table 40: Future Project With Funded Improvements Conditions (Year 2030), Los Angeles CEQA Thresholds Guide Methodology -Intersection Peak Hour Levels of Service -Unsignalized Intersections – Continued

<table>
<thead>
<tr>
<th>813 – 815</th>
<th>Table 40</th>
<th>Future Project With Funded Improvements Conditions (Year 2030), Los Angeles CEQA Thresholds Guide Methodology -Intersection Peak Hour Levels of Service - Unsignalized Intersections – Continued</th>
<th>There is no way of knowing if and when the Metro Project will ever be started let alone completed and what the Project will entail if it gets started. The applicant cannot count on the Metro Project to share any mitigation measures and must fully fund all street and freeway mitigations without the possibility of sharing mitigation costs with the Metro Project or any other proposed project in the area.</th>
</tr>
</thead>
</table>

**Response to Comment No. 12-247**

The comment refers to the tables included as an attachment to the comment letter (see Comment No. 12-399). The referenced table is a copy of table 40, page 813–815, of the Draft EIR, which lists conditions at unsignalized intersections under future conditions without, as well as with, the Project, inclusive of project design features and mitigation measures. Regarding the sharing of mitigation measures, the commenter is referred to Response to Comment Nos. 12-14 and 12-162, above.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-248**

<table>
<thead>
<tr>
<th>816</th>
<th>Table 41</th>
<th>Future with Project with Funded Improvements Conditions (Year 2030) Freeway Segments Levels of Service AM Peak Hours</th>
<th>This table shows the capacities of the 16 Freeway Segments affected by the Project. Intersection # 5 (US 101 North of Campo de Cahuenga Way) &amp; 6 US 101 East of Coldwater Canyon Ave) show that these segments in the future without the Project will be over capacity, and even worse after the Project with Funded</th>
</tr>
</thead>
</table>

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Improvements. Again, the traffic data was gathered in 2007 which does not take into account the addition of 600 housing units in Studio City. This clearly indicates that the traffic placed on these two freeway segments that connect to the Project are intolerable for the infrastructure and the community. The Project must be scaled back to accommodate the freeway infrastructure.

**Response to Comment No. 12-248**

The comment refers to the tables included as an attachment to the comment letter (see Comment No. 12-400). The referenced table is a copy of Table 41, page 816, of the Draft EIR, which lists conditions along freeway segments in the A.M. peak hour under future conditions without, as well as with, the Project with mitigation. As noted in Table 41, contrary to the assertion in the comment, the Project does not result in a significant freeway segment impact at US 101 north of Campo de Cahuenga Way or US 101 east of Coldwater Canyon Avenue. As discussed on page 692 of the Draft EIR, with implementation of project design features and mitigation measures, the Project does result in significant impacts at six other freeway segments.

Regarding traffic count data and housing units in Studio City, the commenter is referred to Response to Comment No. 12-233, above.

Regarding significant and unavoidable impacts, the commenter is referred to Response to Comment No. 12-5, above.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-249**
SEE ATTACHMENT 15  

This comment refers to the table included as an attachment to the comment letter (see Comment No. 12-401). The referenced table is a copy of Table 43, page 818, of the Draft EIR, which lists the Project’s regional transit analysis. As discussed on pages 602–603 of the Draft EIR, Table 25 of the Draft EIR summarizes the maximum load/capacity (load factor) for each transit line serving the Project vicinity. Using the maximum load/capacity, the residual capacity on all lines was calculated per run and during the peak periods. As summarized in Table 25, most lines serving the Project vicinity have excess capacity during a majority of the runs in the peak periods. However, the Metro Rapid 750 operates above the seated capacity during the peak periods. As discussed on page 693 of the Draft EIR, with implementation of the proposed mitigation measures, transit capacity in the vicinity of the Project Site would be more than adequate to accommodate the transit riders generated by the Project.

**Comment No. 12-250**

<table>
<thead>
<tr>
<th>819</th>
<th>Figure 42</th>
<th>Study Area Division</th>
<th>This map shows the area of the intersection study for the Project.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>SEE ATTACHMENT 16</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>820-</th>
<th>Figure 43A-43C</th>
<th>Study Area and Analyzed</th>
<th>These maps show the locations of the intersections studied by</th>
</tr>
</thead>
</table>
Response to Comment No. 12-250

The comment refers to the maps included as attachments to the comment letter which consist of Figures 42, 43A–C, and 44A on pages 819–823 of the Draft EIR (see Comment Nos. 12-402 through 12-404). The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-251

| 834-836 | Figure 46A-46C | Existing Conditions Intersection Level of Service - AM Peak Hour | This map shows the existing conditions on the intersections studied and show just how impacted these intersections already are. Many of these intersections affect Studio City in a negative way and this points out that the current infrastructure cannot handle the increased traffic caused by the Project. The Project must be scaled back to accommodate infrastructure capacities. |
| 837-839 | Figure 47A-47C | Existing Conditions Intersection Level of Service - PM Peak Hours | This map shows the existing conditions on the intersections studied and show just how impacted these intersections already are. Many of these intersections affect Studio City in a negative way and this |
points out that the current infrastructure cannot handle the increased traffic caused by the Project. The Project must be scaled back to accommodate infrastructure capacities.

<table>
<thead>
<tr>
<th>Figure 48</th>
<th>Existing Conditions Freeway Segment Peak Hour Traffic Volumes SEE ATTACHMENT 21</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>840</strong></td>
<td>This map shows the freeway segments affected in peak hours. It also shows the total traffic counts during peak hours and illustrated that some segments are already at or near capacity, and that the freeway infrastructure cannot handle the amount of additional traffic the Project will place on these and other freeway segments.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Figure 49</th>
<th>Existing Conditions Freeway Segment of Service - AM Peak Hour SEE ATTACHMENT 22</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>841</strong></td>
<td>This map clearly shows that there are impacted freeway segments rated below F currently - before the Project, and as stated earlier there will be freeway segments at the Project site that will be rated F or below after mitigations. The freeway infrastructure cannot handle increased traffic from the Project.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Figure 50</th>
<th>Existing conditions Freeway Segment Level of Service - PM Peak Hour SEE ATTACHMENT 23</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>842-846</strong></td>
<td>This map clearly shows that there are impacted freeway segments rated below F currently - before the Project, and as stated earlier there will be freeway segments at the Project site that will be rated F or below after mitigations. The freeway infrastructure cannot handle increased traffic from the Project.</td>
</tr>
</tbody>
</table>
Response to Comment No. 12-251

The comment refers to the figures included as attachments to the comment letter which consist of Figures 46A-C, 47A-C, 48, 49, 50, and 51A-D from pages 834-846 of Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR (see Comment Nos. 12-405 through 12-409). The comment and the referenced figures refer to existing conditions and not impacts from the Project.

Regarding Levels of Service and impacts at intersections, the commenter is referred to Response to Comment No. 12-35, above. Regarding Levels of Service and impacts at freeway segments, the commenter is referred to Response to Comment No. 12-236, above. Regarding significant and unavoidable impacts, the commenter is referred to Response to Comment No. 12-5, above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-252

<p>| | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
</table>
| 847 | Figure 52 | Location of related Projects
SEE ATTACHMENT 24 |
|     |     | This Map shows the proposed projects around the study area. It is obvious, especially since we have no way of knowing which projects will be approved and what they will look like, that the applicant’s Project cannot be built at the scale they are proposing. Some of these other projects will be built and the traffic ramifications of those are unknown. |

Response to Comment No. 12-252

The comment refers to the map included as an attachment to the comment letter which consists of a copy of Figure 52 from page 847 of the Draft EIR (see Comment No. 12-410).
The Draft EIR analyzes the potential cumulative traffic impacts of the Project and all related projects, as identified on the referenced map. As discussed in Response to Comment No. 12-238 above, the Project’s impact has been determined based on future conditions that include traffic from the 256 related projects and other growth included in the Southern California Association of Government’s regional transportation model. For related projects for which traffic study studies have been prepared, the trip generation characteristics from those studies were used. The trip generation characteristics of the remaining related projects was reviewed and approved by the Los Angeles Department of Transportation and represent a fair and reasonable characterization of the likely trip generation from each of these related projects.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-253**

| 848 | Figure 53 | Future Base Roadway Improvements (Year 2030) SEE ATTACHMENT 25, 25A & 25B | This map shows the improvements planned by the year of completion of the Project. Interestingly enough, Barham Blvd. does not appear to be marked as widened as the Project proposes. Why is Barham not widened? There is some skepticism as to the widening of Barham, that it will actually be approved, and that it will not additionally impact the bridge over the freeway from Barham to Cahuenga |

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**Response to Comment No. 12-253**

The comment refers to attachments 25, 25A, and 25B to the comment letter. Attachment 25 consists of a copy of Figure 53 from page 848 of the Draft EIR, Attachment 25A consists of copy of a Google map showing the “Paper East/West Road Along LA River,” and Attachment 25B consists of a copy of the County of Los Angeles Highway Policy Map from the County’s General Plan (see Comment No. 12-411). Attachment 25 shows the Future Base roadway improvements. As discussed on pages 606–607 of the Draft EIR, the roadway network for the Future Without Project Conditions in the Study Area...
is affected by a number of Regional Improvement Plans, local specific plans, and programmed improvements. Figure 53 illustrates the committed base roadway improvements without the Project. The map does not include improvements proposed by the Project. The commenter is referred to Figure 75 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, which depicts the Project’s proposed roadway improvements, including those to Barham Boulevard.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-254**

| No. | Description | Future Base Roadway Improvements (Year 2030) - Continued
<table>
<thead>
<tr>
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</thead>
<tbody>
<tr>
<td>848</td>
<td>Figure 53</td>
<td>SEE ATTACHMENT 25, 25A &amp; 25B</td>
</tr>
</tbody>
</table>

| No. | Description | The Specific Plan street system will serve to separate the types of traffic by destination and minimize co-mingling of resident, visitor, and service traffic via two types of roadways: (1) primary access roads, and (2) internal streets or driveways.  

**STREET SYSTEM**  
A. Primary Access Roads.  
1. The primary access roads to the Studio Production District are Lankershim Boulevard, Universal Hollywood Drive, and The original East/West Road that was to run along the LA River, which is mapped out on the Highway General Plan-County of Los Angeles - SEE ATTACHMENT [sic] 3 -and on the Google Maps diagram - SEE ATTACHMENT 4, must remain part of the Project. This road will relieve traffic from Lankershim at the critical intersection of Cahuena [sic] and allow traffic to circumvent the 5 entrances on Lankershim and access Barham Blvd at Forest Lawn Drive. Additionally, this road will give access to the proposed Residential Section without having to use Barham Blvd.  

| 40  | Appendix A – 1  
Proposed city of Los Angeles Specific Plan |  

**Proposed city of Los Angeles Specific Plan**  
The original East/West Road that was to run along the LA River is not on the map. The East/West road is a necessity to relieve traffic from Lankershim just above the Project and carry it to Lakeside Plaza and Forrest [sic] Lawn Dr.
Universal Studios Boulevard. Blvd, which will already have increased traffic due to the Project.

**Response to Comment No. 12-254**

With regard to the referenced maps, see Response to Comment No. 12-253, above. With regard to the East-West Road, the commenter is referred to Response to Comment No. 12-61 above.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-255**

<table>
<thead>
<tr>
<th>41</th>
<th>Section 7.2</th>
<th>REQUIRED TRAFFIC IMPROVEMENTS:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>A. Phasing plan. Prior to the issuance of the first Substantial Compliance Analysis approval for the first Project developed under this Specific Plan, the Applicant shall submit a Traffic Mitigation Phasing Plan (TMPP) to the Department of Transportation for approval. The Plan shall identify which improvements must be constructed in connection with individual development sites. The Department of Transportation, in consultation with the Director and the Applicant, may modify the</td>
</tr>
<tr>
<td></td>
<td></td>
<td>In no event shall the TMPP (Transportation Mitigation Phasing Plan) be modified by the Project Director or the DOT as to allow a significant impact to remain after the Project is completed.</td>
</tr>
</tbody>
</table>
C. Guarantee of traffic improvements.

1. Prior to the issuance of a building permit for a Project, the Applicant shall guarantee, to the satisfaction of the Department of Transportation, the construction of any required traffic improvements for the Project.

Response to Comment No. 12-255

As stated in the Los Angeles Department of Transportation’s Assessment Letter, which is included as Appendix E-2, to the Draft EIR, “[t]o ensure that the full occupancy of the Project does not take place until all of the required transportation mitigations are implemented, a mitigation phasing plan has been prepared that coordinates all mitigation measures, project development, and the associated permitting (see Attachment J). The phasing plan attempts to maintain an appropriate balance between development and corresponding transportation capacity enhancements. This phasing plan may be modified in the future to adjust the mitigation sequencing. Any changes to the mitigation phasing plan shall be subject to further review and approval by DOT.” As noted on page 687–688 of the Draft EIR, the mitigation phasing plan attached to Appendix E-2 of the Draft EIR is approximate and subject to revisions as the Project is implemented. The Project will be developed through 2030, and the phasing plan may need to be adjusted as implementation of the Project adjusts to market conditions.

Regarding significant and unavoidable impacts, the commenter is referred to Response to Comment No. 12-5, above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-256
### Response to Comment No. 12-256

The Applicant would implement the project design features and mitigation measures required as part of the Project's approvals. Implementation of the mitigation measures will

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**Improvements:**

<p>| | |</p>
<table>
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<tbody>
<tr>
<td>A. Phasing plan. Prior to the issuance of the first Substantial Compliance Analysis approval for the first Project developed under this Specific Plan, the Applicant shall submit a Traffic Mitigation Phasing Plan (TMPP) to the Department of Transportation for approval. The Plan shall identify which improvements must be constructed in connection with individual development sites. The Department of Transportation, in consultation with the Director and the Applicant, may modify the approved TMPP, if he or she determines the TMPP to be infeasible.</td>
<td></td>
</tr>
<tr>
<td>C. Guarantee of traffic improvements.</td>
<td></td>
</tr>
<tr>
<td>1. Prior to the issuance of a building permit for a Project, the Applicant shall guarantee, to the satisfaction of the Department of Transportation, the construction of any required traffic improvements for the Project.</td>
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</tr>
</tbody>
</table>

mitigations without State, Federal, county or city funds.
be monitored through the approved Mitigation Monitoring and Reporting Plan and the approval requirements under the proposed City and County Specific Plans.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-257**

<table>
<thead>
<tr>
<th>42</th>
<th>Section 7.3</th>
<th>RESIDENTIAL PARKING REQUIREMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Automobile parking regulations for residential uses shall be as follows:</td>
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<tr>
<td></td>
<td></td>
<td>A. Single-Family Dwellings. Single-Family Dwellings, single-family detached condominiums, and cooperatives. There shall be two covered off-street parking spaces on the same lot for each Dwelling Unit. No guest parking shall be required.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>B. Two-Family Dwellings (Duplexes). There shall be two off-street parking spaces on the same lot for each Two-Family Dwelling Unit. At least one of these parking spaces shall be covered. No additional guest parking shall be required.</td>
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<tr>
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<td></td>
<td>C. Live-Work Dwellings. There shall be two off-street parking spaces on the same lot for each Live-Work Dwelling Unit. At least one of these parking spaces shall be covered. Additionally, at least one-</td>
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<td></td>
<td></td>
<td>½ Guest parking space shall be provided per Dwelling.</td>
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<tr>
<td></td>
<td></td>
<td>½ Guest parking space shall be provided per Dwelling.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>½ Guest parking space shall be provided per Dwelling.</td>
</tr>
</tbody>
</table>
### D. Multi-family dwellings.

1. Rental units. For Dwelling Units having less than three habitable rooms, there shall be at least one parking space; for three habitable rooms, there shall be at least one and a half parking space; and for more than three habitable rooms, there shall be at least two parking spaces. No additional guest parking shall be required.

2. For-sale units (condominiums, cooperatives). For each Dwelling Unit there shall be at least two parking spaces and at least one-quarter guest parking space per Dwelling Unit.

<table>
<thead>
<tr>
<th>Quarter guest parking space per Live-Work Unit.</th>
<th>$\frac{1}{2}$ Guest parking space shall be provided per Dwelling</th>
</tr>
</thead>
</table>

### Response to Comment No. 12-257

As discussed on page 951–954 in Section IV.B.2, Traffic/Access – Parking, of the Draft EIR, the proposed City Specific Plan parking requirements provide for equal or more parking than that required by the LAMC for the specified uses, except for restaurants and fitness facilities. In addition, as noted in footnote (a) to Table 45 on page 952 of the Draft EIR, the City also assesses a project’s parking requirements in terms of Advisory Agency Policy AA 2000-1 which, in addition to a parking requirement of 2.0 automobile parking spaces/ per dwelling unit, requires condominium projects of more than 6 units to provide 1/4 spaces of guest parking per dwelling unit unless located in a parking congested area, in which case 1/2 spaces of guest parking per unit are required to be provided.
The Parking Congestion Area Map is used to determine whether an area is parking congested. Although the Parking Congestion Area Map indicates that the areas of the Project Site currently located within the City are within a parking congestion area, a large portion of the proposed City Specific Plan area is currently located within the County of Los Angeles. Given that the Project Site is physically separated from surrounding neighborhoods, is a mixed-use development that would focus on pedestrian-friendly features to promote walkability, and is a Transit Oriented Development with a Transportation Demand Management Program, including transit connections to various transit opportunities to reduce the need for and dependence on the automobile, the potential for spillover parking and the need for parking would be reduced. Therefore, a requirement of 0.25 guest space per dwelling unit would satisfy the residential portion of Project’s guest parking demand with regard to Advisory Agency Policy AA 2000-1.

Based on the analysis discussed on pages 953–954 in Section IV.B.2, Traffic/Access – Parking, and reflected in Table 47 on page 955 of the Draft EIR, the Project would provide sufficient parking to meet the demand requirements of the proposed City Specific Plan land uses. Therefore, Project impacts related to parking under the proposed City Specific Plan will be less than significant.

**Comment No. 12-258**

<table>
<thead>
<tr>
<th></th>
<th>3. Required parking spaces for multi-family dwellings may be uncovered. All required parking spaces for multi-family dwellings shall be located within 750 feet of the Dwelling Unit that they are intended to serve.</th>
<th>At lease [sic] ½ of parking spaces for these units must be covered and within 500 ft of the Dwelling Unit that they are intended to serve.</th>
</tr>
</thead>
</table>

**Response to Comment No. 12-258**

See Response to Comment No 12-257, above. The proposed 750 feet is consistent with current LAMC regulations related to shared parking and central parking structures in mixed use districts and shared parking provisions. (See LAMC Sections 12.24 X.20 and 13.09 E). The comment does not address the environmental analysis of the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
### Comment No. 12-259

| 42 – 43 | Section 7.4 | COMMERCIAL PARKING REQUIREMENTS |
|---------|-------------|---------------------------------
|         | A. Non-Occupiable structures. No parking spaces shall be required. |
|         | B. Child care facilities. One parking space per classroom or one parking space for every 500 square feet of Floor Area, whichever is greater. |

Some Commercial Vehicle Parking shall be provided.

This is not enough parking for the Child Care Center - capacity must be increased.

| 42 – 43 | Section 7.4 | COMMERCIAL PARKING REQUIREMENTS |
|---------|-------------|---------------------------------
|         | C. Community Serving Uses. |
|         | 1. Fitness Facility. Four parking spaces for every 1,000 square feet of Floor Area shall be provided. |
|         | 2. Fire Station. Two parking spaces for each fireman on one shift and three visitor parking spaces shall be provided. |
|         | 3. Public Library. Two parking spaces per 1,000 square feet of floor Area up to a maximum of 20 parking spaces. Up to |

If parking is based on Square Footage, there shall be no cap on the number of required spaces.
one-half of these spaces may be shared with the retail parking described in Subsection 7.3.E below if the library is constructed in proximity to a community meeting room. In the event that the library is not located near a community room, the total number of parking spaces for library employees and visitors shall be increased by three additional parking spaces.

4. Police Stop Over Station. Two parking spaces shall be provided regardless of floor Area.

5. Other Community Serving Uses with 1,000 square feet of Floor Area or more. One parking space per 1,000 square feet of Floor Area shall be provided.

D. Commercial Office (Includes Studio Office). One parking space for every 500 square feet of Floor Area shall be provided.

E. Retail. Four parking spaces for each 1,000 square feet of floor Area shall be provided.

F. Restaurant uses. Four parking spaces for each 1,000 square feet of floor Area shall be provided.

This is completely inadequate. More spaces are needed.

Community uses will need more that 1 space per 1000 Sq Ft. This must be increased.

Restaurants will require more than this allotment. Must be increased.
<table>
<thead>
<tr>
<th>Section 7.4</th>
<th>G. Studio Use, other than Ancillary Support Facilities, Studio Support Facilities, sound stage, and warehouse uses. One space for each 500 square feet of Floor Area shall be provided.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>H. Ancillary Support Facilities and Studio Support Facilities, other than sound stage and warehouse uses. No automobile parking spaces shall be required.</td>
</tr>
<tr>
<td></td>
<td>I. Sound Stage. One space for each 1,000 square feet of floor Area shall be provided.</td>
</tr>
<tr>
<td></td>
<td>J. Warehouse. One space for each 1,000 square feet of Floor Area shall be provided.</td>
</tr>
<tr>
<td></td>
<td>K. For uses not listed above, parking space requirements shall be as set forth in Section 12.21.A.4 of the Municipal Code.</td>
</tr>
</tbody>
</table>

Loading Zones must be provided for delivery and miscellaneous vehicles away from sensitive uses. This is not enough. Parking must accommodate trailers and craft services, as well as deliveries. Requirements must be disclosed.

**Response to Comment No. 12-259**

The comment discusses the parking requirements in the City Specific Plan, as such it does not address the environmental analysis in the Draft EIR. As discussed on page 951–954 of the Draft EIR, the proposed City Specific Plan parking requirements provide for equal or more parking than that required by the LAMC for the specified uses, except for restaurants and fitness facilities. Based on the analysis discussed on pages 953–954 and reflected in Table 47 on page 955 in Section IV.B.2, Traffic/Access – Parking, of the Draft EIR, the Project would provide sufficient parking to meet the demand requirements of the proposed City Specific Plan land uses. Therefore, Project impacts related to parking under the proposed City Specific Plan will be less than significant.
Given the nature of the commercial uses proposed in the proposed City Specific Plan area, non-occupiable structures are not anticipated to generate a parking demand beyond the demand addressed by the other commercial structures. The proposed parking requirements for the public library and the police stop-over station were developed in conjunction with the City Police and Library Departments and anticipate the needs of these departments and the location of these uses, within the mixed-use portion of the Project Site, wherein visitors to these facilities would already be parked.

As explained on page 951 in Section IV.B.2, Traffic/Access – Parking, of the Draft EIR, the Los Angeles Municipal Code requires one automobile parking space for every 200 square feet of floor area for a restaurant use that is 1,000 or less square feet in size and one automobile parking space for every 100 square feet for floor area for a restaurant use greater than 1,000 square feet in size. The Project would be developed as an urban mixed-use transit-oriented development that is accessible via a number of alternative modes of travel (i.e., train, bus, tram, shuttle, bicycle, walking). In addition, the Project would include residential uses, neighborhood-serving retail, restaurant uses, and a fitness facility and parking spaces. Many of the employees, visitors, and residents that would use the restaurants associated with the Project would already be parked at the Project Site.

The Project does not deviate from the Los Angeles Municipal Code requirements for loading. In addition, Guideline SE13 of the proposed Universal City Design Guidelines, included as Appendix No. 2 to the proposed City Specific Plan, provides that loading facilities should be located away from major pedestrian routes and intersections and should be visually screened and secured. Production trailers and craft service vehicles are accommodated on the lot in areas adjacent to the associated production as needed.

As stated in the comment and in the Draft EIR, parking for any uses not outlined in the proposed City Specific Plan would be subject to the requirements of the Los Angeles Municipal Code (Section 12.21.A.4). The Los Angeles Municipal Code is available online or through the City Planning Department. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-260**

<table>
<thead>
<tr>
<th>43</th>
<th>Section 7.5</th>
<th>RECREATIONAL PARKING REQUIREMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>A. Public Parks. No automobile parking spaces shall be required.</td>
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<tr>
<td></td>
<td></td>
<td>Public Parks must have parking nearby.</td>
</tr>
</tbody>
</table>
Response to Comment No. 12-260

This comment is similar to Comment No. 12-78. See Response to Comment No. 12-78, above.

Comment No. 12-261

<table>
<thead>
<tr>
<th>43</th>
<th>Section 7.5</th>
<th>RECREATIONAL PARKING REQUIREMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>B. Uses within Open Space Districts. No automobile parking shall be required for any use located in Open Space District No.1, Open Space District No.2, or Open Space District No.3, unless otherwise specified in this Specific Plan.</td>
</tr>
</tbody>
</table>

All open space areas shall have parking for cars and bikes, as well as for maintenance vehicles.

Response to Comment No. 12-261

See Response to Comment No. 12-78, above, for open space parking. As part of the Transportation Demand Management Program, bicycle amenities, such as bicycle racks and lockers, would be provided on the Project Site.

Comment No. 12-262

<table>
<thead>
<tr>
<th>44</th>
<th>Section 7.5</th>
<th>Universal City Specific Plan Conceptual Circulation Plan SEE ATTACHMENT 26</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Additional Bike Paths should be provided along the LA River connecting the initially planned and still necessary East/West Road to the North South Road, thus giving the bikes a second route to Lankershim without going thru the congested Hotel and Theme Park area.</td>
</tr>
</tbody>
</table>
Response to Comment No. 12-262

The commenter is referred to Response to Comment No. 12-154, above, regarding a bicycle path along the Los Angeles River. Regarding the East-West Road, the commenter is referred to Response to Comment No. 12-61, above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-263

<table>
<thead>
<tr>
<th>45 - 46</th>
<th>45 - 46</th>
<th>GENERAL PARKING REGULATIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Section 7.6</td>
<td>B. No roof-top parking shall be permitted on any parking structure within 500 feet of any Existing Off-Site Residential Use.</td>
<td>This distance of parking structure to residential unit is not close enough.</td>
</tr>
</tbody>
</table>

Response to Comment No. 12-263

The Draft EIR text referenced by the comment restricts roof-top parking so that no roof-top parking is permitted within 500 feet of any Existing Off-Site Residential Use. The referenced regulation does not relate to the distance of parking to the proposed residential uses. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-264

<table>
<thead>
<tr>
<th>45 - 46</th>
<th>45 - 46</th>
<th>GENERAL PARKING REGULATIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Section 7.6</td>
<td>C. Co-location of Residential Guest Parking. Residential guest parking spaces may be located with parking spaces for retail, restaurant, or other business provided that the maximum distance between the residential building (lot on which it is located) and the Residential and retail parking must be exclusive of each other and the distance of 750 feet from parking space to residential unit is too far.</td>
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</tbody>
</table>
nearest point of the parking facility shall be no greater than 750 feet distant there from; said distance to be measured horizontally along the streets between the two lots, except that where the parking area is located adjacent to an alley, public walk or private easement which is easily usable for pedestrian travel between the parking area and the use it is to serve, the 750-foot distance may be measured along said alley, walk or easement.

Response to Comment No. 12-264

See Response to Comment No. 12-257, above, regarding the provision of parking and Response to Comment No. 12-258 with regard to the distance from the use to the parking. The parking requirements under the proposed City Specific Plan could be modified to account for shared parking between two or more land uses within the proposed City Specific Plan area through preparation of a Shared Parking Plan and as determined by the Planning Director. (See page 953 of the Draft EIR) Based on the analysis discussed on pages 953–954 and reflected in Table 47 on page 955 of the Draft EIR, the Project would provide sufficient parking to meet the demand requirements of the proposed City Specific Plan land uses. The parking demand analysis reflects the implementation of a shared parking program within the Mixed-Use Residential Area. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-265

<table>
<thead>
<tr>
<th>45 - 46</th>
<th>Section 7.6</th>
<th>GENERAL PARKING REGULATIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>D. Parking Location.</td>
<td>1. All required parking spaces for Dwelling Units shall be</td>
</tr>
</tbody>
</table>
3. All required parking spaces for all other uses may be located anywhere within the Mixed-Use Universal City District.

2. Parking requirements for uses located in the Studio Production District shall be permitted to share parking with uses located in the adjacent Universal Studios Specific Plan area, pursuant to Subsection 7.6E below.

All areas must have their own parking facilities. No shared parking should be allowed.

Response to Comment No. 12-265

See Response to Comment Nos. 12-257 and 12-264, above regarding parking requirements and shared parking.

Comment No. 12-266

E. Reduced/Shared Parking Plan. The parking requirements listed in Subsections 7.3 through 7.5 of this Section may be modified for reduced or shared parking between two or more uses within this Specific Plan area or the Universal Studios Specific Plan area if the Director determines that a lower total number of parking spaces would provide adequate parking for these uses. A reduced/shared parking plan

The Director cannot make changes in the Residential area and without DOT approval, and community input.
shall not be required for special events or Temporary Uses, which may utilize shared parking with other uses as needed on a temporary basis. An application for and consideration of a reduced/shared parking plan shall be processed pursuant to the following requirements:

Response to Comment No. 12-266

The City of Los Angeles Department of Transportation and the public have the opportunity to comment on all aspects of the Project, including the process for the consideration and development of the proposed Specific Plans. They may provide comments on the Draft EIR, as well as during the public hearings that the City and County will hold prior to making any decision whether to approve the Project, including the proposed specific plans. As noted in the comment and on page 947 in Section IV.B.2, Traffic/Access – Parking, of the Draft EIR, the City Planning Director must determine that a lower total number of parking spaces would provide adequate parking for the uses in order to approve reduced parking or shared parking. An application for a reduced/shared parking plan shall include, among other requirements, an analysis of parking demand. In granting a shared parking plan, the Director shall find that the peak hours of operation are different or other operational characteristics warrant such a reduction and that the joint use or shared parking shall not create a negative impact on parking for the surrounding areas or streets. Regarding the provision of parking, see Response to Comment No. 12-257, above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-267

1. Contents of Reduced/Shared Parking Plan. The reduced/shared parking plan shall contain the following information:
   a. An analysis of parking
demand. This analysis shall be conducted by a registered traffic engineer on an hourly basis, from 6:00 a.m. to 12:00 a.m., on a weekday and a weekend day or by other means acceptable to the Director;

b. A description of the portion of the Specific Plan area(s) subject to the reduced/shared parking plan;

c. A description of the uses, hours of operation, parking requirements, and allocation of parking spaces which demonstrates that adequate parking for each use will be available, taking into account their hours of operation;

d. A description of compliance with applicable landscaping and design specifications; and

e. A description of the characteristics of the affected uses and/or special programs which will reduce the need for the required number of parking spaces, which may include the availability of alternative transportation modes.

No changes can be made in the residential area. All other changes must have the approval of DOT and community input.

Residential area excluded.

**Response to Comment No. 12-267**

The commenter is referred to Response to Comment No. 12-266, above. The comment does not address the environmental analysis contained in the Draft EIR. The
comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-268**

| 2. Review. The reduced/shared parking plan application shall be deemed complete within ten days of submittal unless the Director advises the Applicant in writing that the application is considered incomplete and the specific reasons therefore. Within 30 calendar days of receipt of a complete application for a reduced/shared parking plan, the Director shall approve the reduced/shared parking plan application or indicate how the proposed reduced/shared parking plan would not provide adequate parking. This time period may be extended by the mutual consent of the Applicant and Director. If the Director does not act within such 30-day period, the reduced/shared parking plan application shall be deemed approved. The decision of Director shall be final and not appealable. | With DOT and Community approvals. |

**Response to Comment No. 12-268**

The commenter is referred to Response to Comment No. 12-266, above. The comment does not address the environmental analysis contained in the Draft EIR. The
comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-269**

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<table>
<thead>
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<tbody>
<tr>
<td>3. Findings. The Director shall grant a Shared Parking Plan request if he/she makes the following findings:</td>
<td>No passive approval is acceptable. All changes must be signed off by the Director and the Applicant.</td>
</tr>
<tr>
<td>a. The peak hours of operations are different or other operational characteristics warrant such a reduction; and</td>
<td></td>
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<tr>
<td>b. The joint use or shared parking shall not create a negative impact on parking for the surrounding areas or streets.</td>
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</table>

**Response to Comment No. 12-269**

See Response to Comment No. 12-266, above. The comment does not address the environmental analysis contained in the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-270**

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<tbody>
<tr>
<td>3. Findings. The Director shall grant a Shared Parking Plan request if he/she makes the following findings:</td>
<td></td>
</tr>
<tr>
<td>a. The peak hours of operations are different or other operational characteristics warrant such a reduction; and</td>
<td></td>
</tr>
</tbody>
</table>
b. The joint use or shared parking shall not create a negative impact on parking for the surrounding areas or streets.

This calculation must be done with the surrounding areas at capacity.

Response to Comment No. 12-270

See Response to Comment Nos. 12-257 and 12-266, above.

Comment No. 12-271

<table>
<thead>
<tr>
<th>904</th>
<th>Map</th>
<th>Neighborhood Intrusion</th>
</tr>
</thead>
</table>
|     |     | The DEIR lists 5 neighborhoods that will experience Neighborhood Intrusion due to the Project, however, Studio City is not listed as one, even though the map on page 904 shows the intersection of Fruitland & Ventura as included in Intruded Neighborhoods. Also there will be intrusion into the Studio City Island Neighborhood from the traffic on Lankershim.

Response to Comment No. 12-271

The comment references the figure on page 904 of the Draft EIR and the potential for neighborhood intrusion impacts around the intersection of Fruitland Drive and Ventura Boulevard. As explained in Chapter VIII of the Transportation Study (Appendix E-1 to the Draft EIR), Figure 73B on page 904 of the Draft EIR, which is superseded by Figure 73B (Revised) (see Correction and Addition No. IV.B.1.K, Section II, of this Final EIR), illustrates the potential addition of 1,200 daily trips along each of the corridors leading to/from the Project Site under the Future With Project with Funded Improvements (with Transportation Demand Management trip reductions and mitigation measures) and includes, among others, Ventura Boulevard between Lankershim Boulevard/Cahuenga Boulevard and the US 101 southbound ramps/Fruitland Drive. The presence of congested cumulative conditions and the availability of local streets providing a parallel route of travel in the
vicinity of congested portions of the corridor were then investigated for each of the corridors to evaluate the potential for neighborhood intrusion impacts. No intersections are projected to operate at LOS E or F along the Ventura Boulevard corridor from Lankershim Boulevard/Cahuenga Boulevard to US 101 southbound ramps/Fruitland Drive under the Future with Project and Funded Improvements Scenario, therefore, no significant neighborhood intrusion impacts would be anticipated in this area. Accordingly, this area was not identified as an impacted neighborhood in Figure 82 on page 919 of the Draft EIR. For additional information regarding neighborhood intrusion impacts, the commenter is referred to Response to Comment No. 12-142, above and Topical Response No. 7: Neighborhood Intrusion, (see Section III.C, Topical Responses, of this Final EIR. The commenter is referred to Response to Comment No. 12-205, above, for additional information regarding the Island neighborhood. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-272**

| 54 | P#1 | Traffic mitigation measures | If **significant** impacts remain then who pays the cost to correct the problem? Is it the taxpayer? Is it [sic] Universal or a combination thereof? If the taxpayer then does the taxpayer receive any type of financial incentive such as a dividend check from NBC Universal if they are within 5 miles of the project? Will the City of Los Angeles out of the General Fund have to make all necessary traffic mitigation measures? What happens if the City of Los Angeles declares bankruptcy? Do those contracts related to traffic mitigation become invalid? |

City of Los Angeles
Final Environmental Impact Report

NBC Universal Evolution Plan
July 2012

Page 847
Response to Comment No. 12-272

As noted in Response to Comment No. 12-47, above, as required by the Los Angeles Department of Transportation, the Project would be required to implement all transportation project design features and mitigation measures required as part of the Project’s approvals. The commenter is referred to Response to Comment No. 12-5, above, regarding significant and unavoidable impacts and to Response to Comment No. 12-16, above, regarding implementation of mitigation measures. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-273

<table>
<thead>
<tr>
<th></th>
<th></th>
<th>Traffic mitigation measures responsibility</th>
<th>With furloughs and layoffs significantly impacting the Los Angeles Department of Transportation (LADOT) where do they get the resources and manpower to ensure all traffic mitigation measures before, during and after construction is completed.</th>
</tr>
</thead>
<tbody>
<tr>
<td>54</td>
<td>2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Response to Comment No. 12-273

Regarding implementation of mitigation measures, the commenter is referred to Response to Comment No. 12-16, above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-274

<table>
<thead>
<tr>
<th></th>
<th></th>
<th>Implementation requirements</th>
<th>The bus program should include Metro transit beyond the one bus line indicated in the project DEIR.</th>
</tr>
</thead>
<tbody>
<tr>
<td>59</td>
<td>Mitigation Measure B-1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Response to Comment No. 12-274

The commenter is referred to Response to Comment No. 12-163, above, regarding the Project’s transit impacts. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-275

| 59 | Mitigation Measure B-1 | Implementation requirements | Direct connection to Hollywood, Burbank and the Metro Station in North Hollywood would do far more to reduce traffic. |

Response to Comment No. 12-275

Pursuant to Mitigation Measure B-2, the Project Applicant or its successor shall provide a local shuttle system which provides enhanced transit service for Project residents, visitors, employees, and the surrounding community, focusing on providing connections to key destinations such as the Universal City Metro Red Line Station, downtown Burbank, Burbank Media District, Hollywood, Universal CityWalk, and other nearby destinations. Connections to regional transit service shall be provided at the Universal City Metro Red Line Station and the Downtown Burbank Metrolink Station. Approximately 15-minute headways shall be provided during the morning and afternoon peak hours, and 30-minute headways shall be provided during the off-peak hours. A separate connection to the North Hollywood Metro Station is not required, as the shuttle route that connects to the Universal City Metro Red Line Station would provide Project employees, patrons, and residents with connection to the North Hollywood Metro Station via the Metro Red Line. The commenter is referred to Topical Response No. 5: Transit Mitigation (see Section III.C, Topical Responses, of this Final EIR), for further information regarding the proposed shuttle system. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-276

| 67 | Mitigation Measure B-22 | Ventura Freeway eastbound on-ramp & Riverside Drive | All state agency budgets are getting cut. If Cal Trans [sic] or the DOT do not have the ability to fund these items, then the |
Response to Comment No. 12-276

As noted in Response to Comment No. 12-47, above, as required by the Los Angeles Department of Transportation, the Project would be required to implement all transportation project design features and mitigation measures required as part of the Project’s approvals. The commenter is referred to Response to Comment No. 12-16, above, regarding implementation of mitigation measures. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-277

| 2 – 3 | LA DOT ASSESSMENT LETTER | Traffic Impact Analysis Paragraph 1 B. Trip Generation. The source of the trip generation rates used for the office, retail, residential, and hotel land uses is the Institute of Transportation Engineers (ITE) “Trip Generation Handbook, 7th Edition.” However, since the proposed studio-related and theme park uses are unique and are not characterized in the ITE handbook, empirical data from the project site and from other similar studio uses were evaluated. Traffic surveys of the studio-related uses in the existing NBC/Universal campus were used to validate these special use trip generation rates. | The data used to calculate the trip generation for the proposed studio-related and theme park uses cannot be determined utilizing Traffic Surveys from similar studios. There are no similar studios to survey. |
**Response to Comment No. 12-277**

As explained on page 622 of the Draft EIR and in the Transportation Study (Appendix E-1 to the Draft EIR), the empirical data collected for the Project was used to estimate the studio- and theme park–related trip generation. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-278**

<table>
<thead>
<tr>
<th>LA DOT ASSESSMENT LETTER</th>
<th>Traffic Impact Analysis Paragraph 1 B. Trip Generation. The source of the trip generation rates used for the office, retail, residential, and hotel land uses is the Institute of Transportation Engineers (ITE) “Trip Generation Handbook, 7th Edition.” However, since the proposed studio-related and theme park uses are unique and are not characterized in the ITE handbook, empirical data from the project site and from other similar studio uses were evaluated. Traffic surveys of the studio-related uses in the existing NBC/Universal campus were used to validate these special use trip generation rates.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Additionally, all the traffic data used in the study for the project is dated 2007 and does not reflect the normal daily trips generated based on current use.</td>
</tr>
</tbody>
</table>

**Response to Comment No. 12-278**

The comment is referring to a portion of the Los Angeles Department of Transportation’s Assessment Letter, which is included as Appendix E-2, to the Draft EIR.
As stated in the Los Angeles Department of Transportation’s Assessment Letter, the Project’s transportation analysis was prepared with input from the Department of Transportation, the County Department of Public Works, and Caltrans, and “adequately addresses the traffic impacts of the Project.” The commenter is referred to Response to Comment No. 12-145, above, regarding the use of data from 2007. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-279**

<table>
<thead>
<tr>
<th>3</th>
<th>C. Transit-Oriented Development (TOD)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>DOT is currently updating the City’s policies and procedures on the preparation of traffic impact studies. The new policies will promote the goals of State Assembly Bill 32, support improvements that reduce greenhouse gas emissions by reducing the use of single-occupant vehicle trips, and encourage developers to construct transit and pedestrian-friendly projects with safe and walkable sidewalks to and from the transit stations for project patrons.</td>
</tr>
</tbody>
</table>

| Traffic Oriented Development (TOD): How does a project that produces over 36,000 vehicles trips a day promote TOD and conform to AB 32? |

**Response to Comment No. 12-279**

The comment incorrectly states that the Project will generate 36,000 daily trips. As shown in Table 36 in Section IV.B.1 of the Draft EIR, the Project is expected to generate approximately 28,108 daily trips after the implementation of the Transportation Demand Program described in Project Design Feature B-1 in Section IV.B.1 of the Draft EIR. With reference to the Project being a Transit-Oriented Development, by placing a mixed-use development in an urban, in-fill site adjacent to a rail station, the Project meets the criteria of Transit-Oriented Developments. As discussed in Section IV.O, Climate Change, and
Appendix Q of the Draft EIR, the transportation-related features of the Project would support reductions in greenhouse gas emissions and conform to Assembly Bill 32. In particular, the Project would promote “higher density mixed-used development that provides linkages with a variety of multi-modal transportation choices.” (Draft EIR, Section IV.O, Climate Change, page 2129.) As discussed at length in the Draft EIR, the Project’s Transportation Demand Management Program would further reduce greenhouse gas emissions by reducing miles traveled and increasing net miles per gallon. (Draft EIR, Section IV.O, Climate Change, pages 2129–2131.) In short, despite the fact that the Project will generate additional vehicle trips, the Project is consistent with Assembly Bill 32’s promotion of infill development. As stated in the California Air Resources Board, Climate Change Scoping Plan, “[l]ocal governments have the ability to directly influence both the siting and design of new residential and commercial developments in a way that reduces GHG associated with energy, water, waste, and vehicle travel, which may include zoning for more compact and mixed-use residential and commercial development and adopting policies to promote infill and affordable housing.” (California Air Resources Board, Climate Change Scoping Plan, Appendix C—Sector Overviews and Emission Reduction Strategies, C-53 (December 2008).)

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-280**

| 3 | C. Transit-Oriented Development (TOD)  

DOT is currently updating the City’s policies and procedures on the preparation of traffic impact studies. The new policies will promote the goals of State Assembly Bill 32, support improvements that reduce greenhouse gas emissions by reducing the use of single-occupant vehicle trips, and encourage developers to construct transit and pedestrian-friendly projects with safe and walkable sidewalks to and

|  | The Main entrance for autos, and the bike path, as well as for pedestrians, both Universal patrons and Metro Rail patrons all meet at one point. Safety for all of those, especially the pedestrians, is critical. It is not safe to bring everything together at one place. The East West road along the river would elevate [sic] this problem by having the bike path exit on Lankershim above the main entrance, as well as on Lakeside Blvd. entrance/exit. Additionally, the safety issue for pedestrians could be lessened by having a pedestrian bridge |
Response to Comment No. 12-280

The comment is substantially the same as Comment No. 12-206. The commenter is referred to Response to Comment No. 12-206, above. The commenter is also referred to Response to Comment No. 12-144, above, regarding the pedestrian bridge and pedestrian safety.

Comment No. 12-281

<table>
<thead>
<tr>
<th>No.</th>
<th>D. Travel Demand Simulation Model</th>
</tr>
</thead>
<tbody>
<tr>
<td>3</td>
<td>Then, using SCAG socioeconomic forecasts, and the estimated traffic and travel patterns of the 256 related projects in the area (including the proposed Metro Universal project), the model was used to simulate future traffic demands for year 2030.</td>
</tr>
</tbody>
</table>

It is impossible to project which of the 256 proposed projects in the area will move forward, and in fact, if there will be additional projects proposed. Construction phasing is critical to this issue as well. Presently, the Metro Project is unpredictable as to weather [sic] it alone will move forward and, if it does, what the project will look like. This estimate is meaningless and a true estimate cannot be determined at this time.

Response to Comment No. 12-281

As described in Section IV.B.1.2.c(1) of the Draft EIR, the Universal City Transportation Model was developed using the Southern California Association of Governments’ Regional Transportation Plan 2004 Transportation Model and the City’s General Plan Framework Model as the base. As stated in the Los Angeles Department of Transportation’s Assessment Letter (Appendix E-2 to the Draft EIR), the Universal City Transportation Model was calculated consistent with Los Angeles Department of Transportation guidelines. Using Southern California Association of Governments socioeconomic forecasts and the estimated traffic and travel patterns of the 256 related projects for project patrons.
projects in the area, the model was used to emulate future traffic demands in 2030. The commenter is also referred to Response to Comment No. 12-145 above regarding the determination of related projects to be included in the traffic study, and Topical Response No. 3: Defining the Proposed Project (see Section III.C, Topical Responses, of this Final EIR), regarding the Metro Universal project. To the extent a related project does not move forward, the Project traffic analysis would be an overestimation of future traffic conditions. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-282**

<table>
<thead>
<tr>
<th>3 – 4</th>
<th>E. Traffic Impacts</th>
<th>Significant impacts after funded improvements and mitigation are unacceptable. The Project must be reduced in size and the design of traffic mitigations must be revised so as to not have significant impacts after completion of the Project.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>DOT has determined that, before accounting for the trip reduction benefits afforded to projects adjacent to Metro Line stations, of the 148 signalized intersections studied, the project would result in significant traffic impacts at 88 intersections before mitigation. The proposed transportation mitigation program (discussed in the next section) is expected to fully or partially mitigate these project impacts. However, the remaining impact at eight intersections would be considered significant and unmitigated after implementation of the proposed mitigation program. The intersections expected to experience unmitigated impacts during one or both of the peak commute hours are:</td>
<td></td>
</tr>
</tbody>
</table>
### Response to Comment No. 12-282

As further stated in the Los Angeles Department of Transportation’s Assessment Letter, the Project’s traffic analysis was prepared with input and revisions from the Department of Transportation, the County Department of Public Works, and Caltrans and “adequately addresses the traffic impacts of the Project. The [Project Transportation] Study describes a comprehensive set of transportation mitigation measures deemed necessary to fully or partially mitigate the project’s significant traffic impacts.”

Regarding significant and unavoidable impacts, the commenter is referred to Response to Comment No. 12-5, above. The commenter is also referred to Response to Comment No.12-12 regarding alternatives that were analyzed in the Draft EIR that include less development than the proposed Project. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

### Comment No. 12-283

<table>
<thead>
<tr>
<th></th>
<th>E. Traffic Impacts Continued</th>
<th>Intersections 1, 2, 5, 6, &amp; 7 are across the street or a block from the Project and will affect the entrance/exit. It will affect the island neighborhood of Studio City permanently, which is unacceptable. The project must be scaled back as to not impact this neighborhood in this</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>5. Lankershim Boulevard / Cahuenga Boulevard (a.m. peak hour)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>6. Lankershim Boulevard / Main Street (p.m. peak hour)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>7. Lankershim Boulevard /</td>
<td></td>
</tr>
</tbody>
</table>
Of these eight intersections, five are expected to operate at a level-of-service (LOS) of D or better after build-out of the project, and three are adjacent to the project site. See Attachment 27.

**Response to Comment No. 12-283**

The referenced portion of the Los Angeles Department of Transportation’s Assessment Letter summarizes the intersection level of service impacts described in more detail in Section IV.B.1 of the Draft EIR. As discussed on pages 690–691 of the Draft EIR, with implementation of the recommended mitigation measures, significant intersection level of service impacts would remain at nine intersections including the following intersections noted in the comment: Lankershim Boulevard and Cahuenga Boulevard (A.M. peak hour); Lankershim Boulevard and Main Street (P.M. peak hour); Lankershim Boulevard and Campo de Cahuenga Way (A.M. peak hour, and Olive Avenue and Warner Brothers Studios Gate 2/Gate 3 (P.M. peak hour). As shown in Table 39 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, all but one (Lankershim Boulevard & Campo de Cahuenga Way/Universal Hollywood Drive) of the intersections noted in the comment are projected to operate at Level of Service D or better under the Future with Project with Funded Improvements conditions. The Project’s mitigation program includes all feasible mitigation measures to reduce the Project’s impact at these intersections to a level below significance; however, due to physical constraints and/or existing buildings, no feasible mitigation measures can be implemented to reduce the Project’s intersection level of service impact at these locations to a level below significance.

The comment appears to confuse intersection level of service impacts with Project access impacts. With regard to Project access impacts, as discussed on pages 693-694 of the Draft EIR, with implementation of the recommended mitigation measures, impacts would remain at two Project access intersections, including the Lankershim Boulevard and
Campo de Cahuenga/Universal Hollywood Drive (both peak hours) intersection noted in the comment. This intersection is not an access point to the Island neighborhood. Also refer to Response to Comment Nos. 12-142, 12-205, and 12-216, above.

Regarding significant and unavoidable impacts, the commenter is referred to Response to Comment No. 12-5, above. Regarding neighborhood intrusion impacts, the commenter is referred to Response to Comment No. 12-142, above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-284**

| 4 | F. Shared Mitigation | The Applicant must show financial ability to pay for all mitigation planned. The Metro Project may never get off the ground and there may very well not be any shared expense on any of these mitigations. Even if the Metro Project does begin during the planned construction of the Evolution Plan, construction phasing and the possible changes in either project makes relying on shared mitigation not practical. |

Some of the traffic mitigations that were identified in DOT’s assessment letter (dated July 24, 2008) as requirements of the Metro Universal project would improve the overall operations of the intersections beyond what is required to mitigate the Metro Universal project’s impacts. In these cases, the cost of the improvement and the mitigation credit may be shared with the NBC Universal Evolution Plan project. However, if the Metro Universal project is not approved or delayed, then the applicant for this subject project shall implement the mitigation. Similarly, to the extent that the mitigation measures required for the NBC Universal Evolution Plan would improve the overall operations of an intersection, roadway segment or freeway.
Response to Comment No. 12-284

As also stated in the referenced portion of the Los Angeles Department of Transportation’s Assessment Letter, but not included in the comment, it is consistent with the Los Angeles Department of Transportation policies that the cost of traffic mitigation measures can be shared between two or more development projects, provided that the mitigation can fully or partially mitigate the combined impacts of the projects.

Regarding the shared mitigation measures, the commenter is referred to Response to Comment No. 12-14 above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-285

| 5 | II. PROJECT TRANSPORTATION MITIGATION PROGRAM
A comprehensive mitigation program has been developed for the project that includes the following major elements: trip reduction program, transit system enhancements, freeway improvements, traffic signal system upgrades, intersection upgrades and improvements, and neighborhood traffic management measures.

Several physical traffic segment beyond what is required to mitigate the project’s impacts, the cost of the mitigation may be shared with the Metro Universal project or other proposed developments.

Project Transportation Mitigation Program: “no feasible mitigation measures were identified,” why is that phrase acceptable under CEQA and AB 32?
mitigation improvement options at the impacted intersections were evaluated in an attempt to fully mitigate the impacts; however, in some cases, no feasible mitigations were identified due to the constraints of the existing physical conditions. Also, for other locations, street widening was not an option due to right-of-way constraints or it was not considered practical nor desirable to widen the street at the expense of reduced sidewalk widths. In other cases, traffic flow improvements that required the removal of on-street parking along a roadway with a high demand for parking were not recommended.

Response to Comment No. 12-285

The commenter is referred to Response to Comment No. 12-5, above. The comment's reference to AB 32 is out of place here because the clause quoted in the comment (“no feasible mitigation measures were identified”) refers to “physical traffic mitigation improvement options at the impacted intersections,” not to measures taken to reduce greenhouse gas emissions. Further, despite quoting portions of Part II (Project Transportation Mitigation Program) of the Los Angeles Department of Transportation’s Assessment Letter, the comment appears to overlook the first three sentences of that Part, which notably addresses greenhouse gas emissions and provides context for the sentences quoted in the comment. The first three sentences of the aforementioned Part II are reproduced below:

“Sustainability, smart growth and the reduction of greenhouse gas emissions have become prime concerns for the City in addition to traditional mobility considerations. Therefore, under the direction of DOT, the mitigation
program was designed to first focus on providing project employees, visitors and tenants with usable and accessible transit options, and on developing an aggressive trip reduction program. However, freeway, street and intersection improvements to enhance mobility and remove bottlenecks were also evaluated and, if feasible, are included in the mitigation program.”

The commenter is also referred to Response to Comment No. 12-279, above, which discusses how the transportation-related features and mitigations of the Project would support reductions in greenhouse gas emissions and conform to Assembly Bill 32.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-286**

<table>
<thead>
<tr>
<th>5</th>
<th>II. PROJECT TRANSPORTATION MITIGATION PROGRAM</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>A comprehensive mitigation program has been developed for the project that includes the following major elements: trip reduction program, transit system enhancements, freeway improvements, traffic signal system upgrades, intersection upgrades and improvements, and neighborhood traffic management measures.</td>
</tr>
<tr>
<td></td>
<td>Several physical traffic mitigation improvement options at the impacted intersections were evaluated in an attempt to fully mitigate the impacts; however, in some cases, no feasible mitigations were identified due to the constraints of the existing physical conditions. Also, for other locations, street</td>
</tr>
</tbody>
</table>

The applicant proposes to add one bus to aid transit, which is woefully inadequate. Additionally, they plan on supplying that bus for approximately 1/3 of the construction phases of the project, and paying for that bus for only about 1/3 of the time it is supplied, while expecting the City/State to supplement the fares on the bus for most of the time it is supplied. This is completely unsatisfactory.
widening was not an option due to right-of-way constraints or it was not considered practical nor desirable to widen the street at the expense of reduced sidewalk widths. In other cases, traffic flow improvements that required the removal of on-street parking along a roadway with a high demand for parking were not recommended.

**Response to Comment No. 12-286**

The comment appears to refer to Mitigation Measure B-1; however, the comment incorrectly states that the additional bus to the Metro Rapid 750 service as described in Mitigation Measure B-1 would be provided for one-third of the construction phases of the Project. The commenter is referred to Response to Comment No. 12-163 above regarding responsibility for the provision and funding of the bus.

As further noted in the Los Angeles Department of Transportation’s Assessment Letter, “[t]he applicant shall record a covenant and agreement to the satisfaction of Los Angeles Department of Transportation to guarantee provisions of [Mitigation Measure B-1].”

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-287**

<table>
<thead>
<tr>
<th>5</th>
<th>II. PROJECT TRANSPORTATION MITIGATION PROGRAM</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>A comprehensive mitigation program has been developed for the project that includes the following major elements: trip reduction program, transit</td>
</tr>
<tr>
<td></td>
<td>A new transit study should be completed, since it has been some years since the one used in the proposal, and if implemented, the transit study must be updated during all phases of the construction. Additionally, the project</td>
</tr>
</tbody>
</table>
system enhancements, freeway improvements, traffic signal system upgrades, intersection upgrades and improvements, and neighborhood traffic management measures. Several physical traffic mitigation improvement options at the impacted intersections were evaluated in an attempt to fully mitigate the impacts; however, in some cases, no feasible mitigations were identified due to the constraints of the existing physical conditions. Also, for other locations, street widening was not an option due to right-of-way constraints or it was not considered practical nor desirable to widen the street at the expense of reduced sidewalk widths. In other cases, traffic flow improvements that required the removal of on-street parking along a roadway with a high demand for parking were not recommended.

applicant must pay the entire cost of the additional transit needs during the entire construction phase.

<table>
<thead>
<tr>
<th>Response to Comment No. 12-287</th>
</tr>
</thead>
<tbody>
<tr>
<td>With regard to the time period for preparation of the Transportation Study, please refer to Response to Comment Nos.12-145 and 12-163, above. The analysis was also reviewed and approved by the Los Angeles Department of Transportation. (See the Los Angeles Department of Transportation’s Assessment Letter, Appendix E-2 to the Draft</td>
</tr>
</tbody>
</table>
EIR.) The Los Angeles Department of Transportation does not require the transit analysis to be updated during subsequent phases of construction.

As discussed on Page 693 of Section IV.B.1, Traffic/Access – Traffic/Circulation of the Draft EIR, with implementation of the recommended mitigation measures, the Project’s impacts on transit would be less than significant.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-288**

| 5 | II PROJECT TRANSPORTATION MITIGATION PROGRAM – Continued | If no feasible mitigations can be achieved, the Project should be scaled back to work within physical constraints. This Project is located at the “Pinch Point” of the San Fernando Valley and there is little or nothing that can be done to improve freeway and major street issues that currently exist. It is unacceptable to add to this already over capacity traffic situation. |

**Response to Comment No. 12-288**

As further stated in the Los Angeles Department of Transportation’s Assessment Letter, the Project’s traffic analysis was prepared with input and revisions from the Department of Transportation, the County Department of Public Works, and Caltrans and “adequately addresses the traffic impacts of the Project. The [Project Transportation] Study describes a comprehensive set of transportation mitigation measures deemed necessary to fully or partially mitigate the Project’s significant traffic impacts.”

Regarding significant and unavoidable traffic impacts and alternatives that were analyzed in the Draft EIR that include less development than the proposed Project, the commenter is referred to Response to Comment No. 12-5, above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.
Comment No. 12-289

<table>
<thead>
<tr>
<th></th>
<th>A. Transportation Demand Management (TDM) Program</th>
<th>What specific, “inherent incentives” are being provided for employees, visitors and tenants?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Through thoughtful building design and orientation, this project can provide a pedestrian-friendly environment, can promote non-automobile travel and can support the goals of an aggressive trip reduction program.</td>
<td></td>
</tr>
</tbody>
</table>

Response to Comment No. 12-289

As described in Project Design Feature B-1 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, the Project would develop and implement a Transportation Demand Management Program that may include the following strategies:

- Flexible work schedules and telecommuting programs;
- Alternative work schedules;
- Bicycle and pedestrian-friendly environment (i.e., established and clear pedestrian networks, intersections, and built environments);
- Bicycle amenities;
- Rideshare/carpool/vanpool promotion and support;
- Mixed-use development;
- Education and information on alternative transportation modes;
- Transportation Information Center;
- Guaranteed Ride Home Program;
- Join an existing or form a new Transportation Management Association;
- On-site flex cars;
• Discounted employee and tenant transit passes; and

• The Transportation Demand Management program shall include financial mechanisms and/or programs to provide for the implementation of the Transportation Demand Management program.

Additional detail regarding the Transportation Demand Management Program is included in the Los Angeles Department of Transportation’s Assessment Letter referenced in the comment, which provides that a preliminary TDM program shall be prepared and provided for the Los Angeles Department of Transportation and County of Los Angeles Director of Regional Planning review prior to the issuance of the first building permit for this project and a final TDM program approved by the Los Angeles Department of Transportation is required prior to the issuance of the first certificate of occupancy for the project. The commenter is also referred to Topical Response No. 4: Transportation Demand Management Program (see Section III.C, Topical Responses, in this Final EIR), for additional detail regarding the components of the TDM program.

The commenter is also referred to Response to Comment No. 12-146, above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-290

| 5 | A. Transportation Demand Management (TDM) Program Through thoughtful building design and orientation, this project can provide a pedestrian-friendly environment, can promote non-automobile travel and can support the goals of an aggressive trip reduction program. | When completed pedestrian traffic is exposed to massive vehicle traffic, as well as bicycle traffic, at the main entrance to the site. A pedestrian bridge is needed to get traffic safely across Lankershim, especially to the Metro Station. |

Response to Comment No. 12-290

Regarding the pedestrian bridge and pedestrian safety, the commenter is referred to Response to Comment No. 12-144, above. The comment is noted and has been
incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-291**

<table>
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<tr>
<th>#:</th>
<th>Paragraph</th>
<th>Description</th>
<th>Response</th>
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<tbody>
<tr>
<td>6</td>
<td>Paragraph 2</td>
<td>A preliminary TDM program shall be prepared and provided for DOT review prior to the issuance of the first building permit for this project and a final TDM program approved by DOT is required prior to the issuance of the first certificate of occupancy for the project. The TDM program should include, but not be limited to, the following strategies: bicycle and pedestrian-friendly environment</td>
<td>Will the TDM Program include everything listed? Especially GUARANTEED ride home program and IRS Code 132(f) for pre-tax dollar transit commute expense accounts? TDM approval from the DOT should take place before the project begins. If t [sic] not, the DOT should approve the DM measures in phases of the Project as needed. Issuing approval prior to the issuance of the first certificate of occupancy for the Project is too late and unacceptable.</td>
</tr>
</tbody>
</table>

**Response to Comment No. 12-291**

Regarding the components of the Transportation Demand Management Program, see Response to Comment No. 12-146, above. Consistent with the City of Los Angeles Department of Transportation’s Assessment Letter, the proposed City and County Specific Plans provide that the Transportation Demand Management Program shall be prepared to the satisfaction of the Los Angeles Department of Transportation and the County Director of Regional Planning prior to the issuance of the first Substantial Compliance Review for the first Project developed under the proposed City Specific Plan and the first Substantial Conformance Review for the first Project under the proposed County Specific Plan, respectively. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-292**

<table>
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<tr>
<th>#:</th>
<th>Paragraph</th>
<th>Description</th>
<th>Response</th>
</tr>
</thead>
</table>
| 6  | Paragraph 2 | bicycle and pedestrian-friendly environment | The Project needs to have a bike path alone [sic] the East/West road (which should
not be removed from the project) to allow for additional exits and entrances other than the main entrance. Bike safety would be greatly improved if there was more than one entrance/exit, which as it is now would be the main entrance with all the autos and pedestrians.

Response to Comment No. 12-292

Regarding the East-West Road, the commenter is referred to Response to Comment No. 12-61 above.

With regard to a bike path along the northern Project Site boundary, the commenter is referred to Response to Comment No. 12-154, above.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-293

9  Paragraph 1  The proposed Shuttle System program is acceptable to DOT; however, the program should be guaranteed for a minimum of 20 years.  

Response to Comment No. 12-293

As noted in Response to Comment No. 12-47, above, as required by the Los Angeles Department of Transportation, the Project would be required to implement all transportation project design features and mitigation measures required as part of the Project’s approvals. As noted in Mitigation Measure B-2, funding for the shuttle system shall be guaranteed for 20 years. It is anticipated that after 20 years, depending on ridership, the shuttle could be integrated into a public transportation system service. The
comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-294**

| 9 | C. Freeway Interchange Improvements |
|   | In accordance with the project’s traffic mitigation plan, the applicant shall enter into a Highway Improvement Agreement with Caltrans that ensures the applicant’s involvement in the design, funding and timely completion of these improvements. |
|   | The applicant must be responsible for all costs associated with freeway interchange improvements. |

**Response to Comment No. 12-294**

As stated in the referenced portion of the Los Angeles Department of Transportation’s Assessment Letter, but not included in the comment, “[t]he applicant has met and consulted with staff from DOT and Caltrans’ District 7 regarding the design and feasibility of freeway system improvements. The Project would construct a new on-ramp for Universal Studios Boulevard to the southbound US-101 freeway and would modify the interchange at the US-101 freeway at Universal Terrace Parkway (Campo de Cahuenga Way).”

As noted in Response to Comment No. 12-47, above, the Project would be required to implement all transportation project design features and mitigation measures required as part of the Project’s approvals. The commenter is referred to Response to Comment No. 12-16, above, regarding implementation of mitigation measures. The commenter is also referred to Response to Comment Nos. 12-47 and 12-155, above, regarding funding of and responsibility for freeway improvements. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-295**

| 10-11 | 2. US 101 Freeway/Universal | D. Freeway Main Line | All mitigation measures must be worked out before work on |
According to the traffic study, which includes a freeway impact analysis, the Project is expected to result in **significant** traffic impacts on the freeway system...

To mitigate impacts on the freeway system, Caltrans typically requires a fair-share contribution toward specific mainline improvements. Caltrans staff will lead this effort and will determine the required freeway mitigations or fair-share financial requirements for this Project. It is expected that the applicant will continue to work with Caltrans to explore alternatives, to evaluate the feasibility of each proposal, to prepare design plans and to prepare any necessary environmental documents....

the Project begins. The applicant must be financially responsible with finances in place to cover any CalTrans [sic] “Fair Share” if the state cannot contribute or contribute in a timely manner.

---

**Response to Comment No. 12-295**

As also stated in the referenced portion of the Los Angeles Department of Transportation’s Assessment Letter, but not included in the comment, “[t]he applicant has worked with Caltrans’ District 7 staff to identify a set of potential freeway mainline improvements to offset these impacts and to address existing deficient traffic conditions....” As explained in Response to Comment No. 12-47 above, the traffic impact analysis does not include any mitigation credit that would result from freeway mainline improvements.

Refer to Caltrans’ traffic assessment letter dated February 3, 2011, and Topical Response No. 6: Freeway Improvements (see Section III.C, Topical Responses, of this Final EIR), for additional detail. The comment is noted and has been incorporated into the
Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-296**

| Consideration of improvements to the US-101 freeway adjacent to the Project site should also include the improvement of the Barham Boulevard bridge over the freeway. This is a chronic bottleneck location and should be included in any regional improvement program for this area. | Improvement of the Barham Bridge is a must. This bridge can not [sic] handle the traffic now, let alone increased traffic from the Project, especially from the widening of Barham to accommodate the increased traffic for the residential portion of the Project. |

**Response to Comment No. 12-296**

As noted in Response to Comment Nos. 12-171 and 12-172, above, the Project’s proposed improvements described in Mitigation Measures B-18 and B-19 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR fully mitigate the Project’s impacts at both intersections serving the Barham Boulevard bridge. The recommended Project mitigation measures have been reviewed and approved by the Los Angeles Department of Transportation and have been deemed sufficient to fully mitigate the Project’s impacts. The Project is required to mitigate the incremental Project impacts and is not responsible for the pre-existing condition. The commenter is referred to Response to Comment No. 12-296, above. With regard to freeway improvements, the commenter is referred to Topical Response No. 6: Freeway Improvements (see Section III.C, Topical Responses, of this Final EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-297**

<table>
<thead>
<tr>
<th>12</th>
<th>F. Project Related Transportation Improvements</th>
<th>2. North -South Road Connections</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>A new system of streets internal to the Project should be constructed to provide linkage to the North-South</td>
<td>What happened to an East/West road as originally proposed?</td>
</tr>
<tr>
<td></td>
<td>The original project plan called for an East/West road that ran along the river. The County</td>
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</table>
III.D.1  Written Letters

| Road, to meet emergency vehicle access requirements and to ensure proper access and circulation within the project site. The Applicant shall work with DOT during the tract map approval process on the internal street system design. | highway map (1980) shows such a road is required. The North/South road that is currently on the plan does nothing to alleviate the traffic and circulation issues the East/West road would eliminate. The East/West road is a must and should be built along with the North/South road. |

**Response to Comment No. 12-297**

The commenter is referred to Response to Comment No. 12-61 above, regarding the East-West Road. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-298**

| 15 | 1. Barham Blvd and Cahuenga Blvd (IS #47) - widen to install an additional westbound through lane on Cahuenga Boulevard. The westbound approach would provide two through lanes, and one right-turn lane. This mitigation would require right-of-way acquisition from Caltrans; therefore, this impact would remain unmitigated if the applicant is not successful in acquiring the necessary right-of-way. This could potentially be a shared mitigation with the Metro Universal project. | This mitigation is a huge issue and must be required if the Project moves forward with the residential portion. There is no way this intersection in its current state can handle increased traffic. |

3. Barham Blvd and Coyote
Canyon Rd (IS #54) - in addition to funding the upgrade of the traffic signal controller, widen to install an additional southbound through lane. This intersection is included in the Barham Blvd. roadway improvement described above.

Response to Comment No. 12-298

The comment references a portion of the Los Angeles Department of Transportation’s Assessment Letter that summarizes certain transportation improvements, including Mitigation Measure B-18, that are discussed in more detail in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR.

As noted in Response to Comment No. 12-47, above, the Project would be required to implement all transportation project design features and mitigation measures required as part of the Project’s approvals. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-299

1. Barham Blvd and Cahuenga Blvd (IS #47) - widen to install an additional westbound through lane on Cahuenga Boulevard. The westbound approach would provide two through lanes, and one right-turn lane. This mitigation would require right-of-way acquisition from Caltrans; therefore, this impact would remain unmitigated if the applicant is not successful in acquiring the necessary right-of-way. This Items 3 - 6 are mandatory if the traffic flow is to be controlled on Barham Blvd. and must be included in any final plan and fully funded by the applicant.
could potentially be a shared mitigation with the Metro Universal project.

3. Barham Blvd and Coyote Canyon Rd (IS #54) - in addition to funding the upgrade of the traffic signal controller, widen to install an additional southbound through lane. This intersection is included in the Barham Blvd. roadway improvement described above.

4. Barham Blvd and De Witt Dr (IS #52) - widen to install an additional southbound through lane. This intersection is included in the Barham Boulevard roadway improvement described above.

5 Barham Blvd and Lake Hollywood Dr (IS #53) - widen to install an additional southbound through lane. This intersection is included in the Barham Boulevard roadway improvement described above.

6. Barham Blvd and Lakeside Plaza/Forest Lawn Dr (IS #55) - in addition to funding the upgrade of the traffic signal controller, this intersection will be improved as part of both the Barham Boulevard roadway improvement. Items 3-6 are mandatory if the traffic flow is to be controlled on Barham Blvd. and must be included in any final plan and fully funded by the applicant.
**Response to Comment No. 12-299**

The comment is similar to Comment No. 12-298. The commenter is referred to Response to Comment No. 12-298, above.

**Comment No. 12-300**

| 20 | Paragraph 2 | DOT would like to reduce the use of dual right-turn lanes to minimize potential pedestrian conflicts and is currently considering additional signal configuration and operational improvements at this intersection. In the event that DOT recommends the elimination of the double right-turn movement on the northbound and southbound approaches of Lankershim Boulevard, the restriping and/or widening may not be required and the incremental Project impact would increase at this intersection and the intersection would continue to remain significantly impacted. | A significant impact at this intersection (Lankershim/Campo de Cahuenga/Universal Hollywood) is out of the question. This is the main entrance to the Project and if there is any intersection that must not be left with a significant impact, it is this one. Blocked traffic at this intersection would be a nightmare for the Island Neighborhood of Studio City and an extreme safety hazard for the pedestrians and bike traffic. |

**Response to Comment No. 12-300**

The comment is similar to Comment No. 12-283, above. The commenter is referred to Response to Comment No. 12-283, above.

**Comment No. 12-301**

| 21 - 22 | H. Neighborhood Traffic Management Program | Studio City is not identified as an impacted community, which is incorrect. The Studio City |
According to the residential street impact analysis included in the traffic study, five neighborhoods were identified for their potential to be impacted by the project’s traffic. A local residential street is considered to be impacted based on an increase in the average daily traffic volumes. The objective of the residential ... neighborhood south of Ventura at Vineland will be impacted due to work on the 101 south bound on ramp and the construction work on a new on ramp at Fruitland.

Response to Comment No. 12-301

The commenter is referred to Response to Comment Nos. 12-142, 12-230 and 12-271 above, regarding neighborhood intrusion impacts. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-302

As an impacted neighborhood, speed bumps must be installed on Vineland south of Ventura.

The applicant must be responsible for whatever the cost is to mitigate neighborhood intrusion, with no limit or predetermined budget.

Studio City is not identified as an impacted community - which is not the case. Studio City is heavily impacted and must be added to the list of impacted neighborhoods.
The applicant has submitted an initial NTMP Implementation Plan to DOT (see Attachment I) that sets key milestones and identifies a proposed process in developing a NTM plan for the five identified neighborhoods consistent with DOT policy.

As discussed in the initial plan, the agreement should include a funding guarantee, an outreach process and budget for each of the identified neighborhoods, selection and approval criteria for any evaluated NTM measures, and an implementation phasing plan.

The outreach program should include the Neighborhood Councils that surround the Project.

Response to Comment No. 12-302

Regarding the neighborhood around Vineland Avenue south of Ventura Boulevard, as shown in Figure 73B on page 904 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, which is superseded by Figure 73B (Revised)(see Correction and Addition No. IV.B.1.K, Section II, of this Final EIR), the Project is not expected to result in a significant neighborhood intrusion impact within the area referenced in the comment under the Future with Project with Funded Improvements scenario. Regarding the neighborhood protection fund, the commenter is referred to Response to Comment No. 12-226, above. Regarding neighborhood intrusion impacts, the commenter is referred to Response to Comment Nos. 12-157 and 12-230, above and Topical Response No. 7: Neighborhood Intrusion (see Section III.C, Topical Responses, of this Final EIR).

Regarding the outreach program, the Los Angeles Department of Transportation’s Neighborhood Traffic Management Plan Implementation Plan Process is included with the Los Angeles Department of Transportation’s Assessment Letter (Appendix E-2 to the Draft EIR), which provides that the transportation consultant for the Applicant or its successors shall work with the City Council Offices in the impacted neighborhoods for the implementation of the program. The comment is noted and has been incorporated into the
Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-303**

<table>
<thead>
<tr>
<th>25</th>
<th>Paragraph 2</th>
<th>V. GENERAL CONDITIONS</th>
<th>Project applicant must guarantee that all mitigation will be financed by the applicant without any funds coming from state or local government agencies.</th>
</tr>
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<tbody>
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<td></td>
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<td>In accordance with the project’s traffic mitigation phasing plan, all transportation improvements and associated traffic signal work within the City of Los Angeles must be <strong>guaranteed</strong> through the B-Permit process of the Bureau of Engineering, prior to the issuance of the building permits for such phase and <strong>completed</strong> prior to the issuance of the certificates of occupancy for such phase.</td>
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</table>

**Response to Comment No. 12-303**

As noted in Response to Comment No. 12-47, above, the Project would be required to implement all transportation project design features and mitigation measures required as part of the Project’s approvals. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-304**

<table>
<thead>
<tr>
<th>25</th>
<th>Paragraph 2</th>
<th>V. GENERAL CONDITIONS</th>
<th>Traffic measurements must be conducted during each phase and if the mitigation(s) are found to be insufficient, the applicant will consult with the DOT and conform to any DOT recommendations on a per phase basis. No Certificate of Occupancy should be issued</th>
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<tbody>
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<td>In accordance with the project’s traffic mitigation phasing plan, all transportation improvements and associated traffic signal work within the City of Los Angeles must be <strong>guaranteed</strong></td>
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**City of Los Angeles**
Final Environmental Impact Report

**NBC Universal Evolution Plan**
July 2012
through the B-Permit process of the Bureau of Engineering, prior to the issuance of the building permits for such phase and **completed** prior to the issuance of the certificates of occupancy for such phase. without the completion of the restructured mitigation(s).

### Response to Comment No. 12-304

Regarding implementation of mitigation measures and phasing, the commenter is referred to Response to Comment No. 12-16, above. The commenter is referred to Response to Comment No. 12-37, above, regarding the required periodic trip monitoring. The provisions described that would apply to the residential development would also apply to the rest of the proposed Project. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

### Comment No. 12-305

|   | Paragraph 3 | If a proposed traffic mitigation measure does not receive the required approval, a substitute mitigation measure may be provided subject to the approval of DOT or other governing agency with jurisdiction over the mitigation location, upon demonstration that the substitute measure is equivalent or superior to the original measure in mitigating the project’s **significant** traffic impact. To the extent that a mitigation measure proves to be infeasible and no substitute mitigation is available, then a **significant** traffic impact would remain. | SEE APPENDIX 1 CITY OF BURBANK RESPONSE [sic] |
Response to Comment No. 12-305

The comment references Appendix 1 (Comment No. 12-414). Appendix 1 (also described as “Transportation Appendix” in the comment) is a copy of a draft comment letter from the City of Burbank, which is included as Comment Letter No. 27 to this Final EIR. Please refer to Comment Letter No. 27. The commenter is also referred to Comment Letter No. 26, which is the final comment letter submitted by the City of Burbank that superseded Comment Letter No. 27. Please refer to Comment Letter No. 26 for responses to the final comment letter submitted by the City of Burbank.

Comment No. 12-306

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<th>Paragraph 3</th>
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<tr>
<td>25</td>
<td>If a proposed traffic mitigation measure does not receive the required approval, a substitute mitigation measure may be provided subject to the approval of DOT or other governing agency with jurisdiction over the mitigation location, upon demonstration that the substitute measure is equivalent or superior to the original measure in mitigating the project’s significant traffic impact. To the extent that a mitigation measure proves to be infeasible and no substitute mitigation is available, then a significant traffic impact would remain.</td>
<td>If a planned mitigation measure is infeasible and a new mitigation measure is developed, how can that new measure be superior to the measure that is infeasible? There must be no significant impacts created by the Project once all the mitigation(s) are in place. If that situation exists, the applicant must scale back the Project so as to not leave the community with a significant impact once all mitigation measures are in place.</td>
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Response to Comment No. 12-306

Regarding mitigation measures that require approval from other jurisdictions prior to implementation, as stated on page 660 of the Draft EIR, if any of the necessary permit approvals to implement the mitigation measures cannot be obtained, then a significant impact (or impacts) may remain. All traffic mitigation measures within the responsibility and
jurisdiction of public agencies other than the City of Los Angeles shall be monitored through the Los Angeles Department of Transportation and implemented to the extent feasible. If improvements within the responsibility and jurisdiction of public agencies, other than the City of Los Angeles (e.g., City of Burbank, City of West Hollywood) cannot be implemented significant traffic impacts may remain at such locations. To the extent that a mitigation measure requires the approval of a jurisdiction other than the City of Los Angeles, the Draft EIR concludes that a significant impact may remain if the decision makers for the respective jurisdiction do not approve the mitigation measure as detailed in the Draft EIR. Regarding significant and unavoidable impacts and alternatives that were analyzed in the Draft EIR that include less development than the proposed Project, the commenter is referred to Response to Comment No. 12-5, above.

Comment No. 12-307

<table>
<thead>
<tr>
<th>27</th>
<th>VI. Other Comments</th>
<th>A. Los Angeles River Bike Path</th>
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<tbody>
<tr>
<td>In February 2007, the City of Los Angeles announced the start of a comprehensive Los Angeles River revitalization plan that includes the completion of the bike path along the river to connect Downtown Los Angeles with Canoga Park. In addition to revitalizing the river, the goal of this project is to provide a continuous and functional riverfront bike path that extends through the City of Los Angeles and is part of an integrated Countywide bicycle plan. DOT fully supports the Los Angeles River Bike Path project. The close proximity of this Project, the Metro Universal project, and the Metro Red Line station to a bike path along the Los Angeles River Flood Control</td>
<td>The applicant is asking to be relieved of the necessity of an original East/West road that the Highway Department has on its 1980 plan to run along the Los Angeles River. The applicant must not be relieved of the necessity of constructing the East/West road as it is invaluable to traffic congestion and circulation by providing an internal entrance and exit other than the main entrance and exit and connect Lankershim Blvd with Lakeside Plaza.</td>
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Channel can provide for an enhanced multi-modal transportation system in this area that provides commuters with more options and alternatives to driving a vehicle.

**Response to Comment No. 12-307**

Regarding the East-West Road, the commenter is referred to Response to Comment No. 12-61 above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-308**

If this road were to remain a requirement to the Project, a bike path could be installed to run next to the road and supply an additional entrance and exit to the project and relieve some of the congestion created by the bike path starting at the main entrance along with the all the auto and pedestrian traffic.
Response to Comment No. 12-308

The commenter is referred to Response to Comment No. 12-154, above, regarding a bicycle path along the Los Angeles River. Regarding the East-West Road, the commenter is referred to Response to Comment No. 12-61 above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-309

<table>
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<tr>
<th>27</th>
<th>VI. Other Comments</th>
<th>A. Los Angeles River Bike Path -Continued</th>
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<tr>
<td></td>
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<td>While DOT supports the bicycle system features proposed in the project's design, a truly comprehensive multi-modal system would include a riverfront bike path. This project does not propose to construct any new buildings within 20-feet of the edge of the Los Angeles River Flood Control Channel, but the project scope does not include the removal of the existing constraints. To preserve the future right-of-way for any Los Angeles River bike path options, DOT recommends that any future plans for the northern edge of the project site prohibit construction within the anticipated footprint of a future Los Angeles River bike path (currently estimated at 20-feet from the edge of the river channel.</td>
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<td>The Project should be required to remove existing structures in order to include the construction of the required East/West Road. The entire city of Los Angeles is constructing bike paths along the LA River and there is no reason that the applicant should be exempted from the same. With the scope of work this project requires in as far as demolition of existing structures and infrastructure, it can be altered (redesigned) to conform with the city's plan to create a bike path along the entire stretch of the LA River.</td>
</tr>
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</table>
Response to Comment No. 12-309

The commenter is referred to Response to Comment No. 12-154, above, regarding a bicycle path along the Los Angeles River. Regarding the East-West Road, the commenter is referred to Response to Comment No. 12-61 above. It should be noted that the alignment of the East-West road as shown on the County Highway Plan is different from the location of the existing River Road and would not be contiguous with the Los Angeles River Flood Control Channel. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-310

<table>
<thead>
<tr>
<th>27</th>
<th>VI Other Comments</th>
<th>B. BARHAM BOULEVARD BRIDGE</th>
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<tr>
<td></td>
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<td>As stated above, the applicant should continue to work with Caltrans to develop meaningful freeway enhancements that can serve to alleviate commuter congestion. Improving traffic flow along the freeway mainline can provide for enhanced travel along the City’s street network. However, any improvements to the US-101 freeway adjacent to the project site should also include the replacement (or retrofitting) and expansion of the Barham Boulevard bridge over the freeway.</td>
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<td>The Barham bridge is currently congested at all times of the day and night. It is unacceptable that any widening of any part of Barham, building of any additional residence units in the area (particularly the scope of which the Project plans) and any freeway alteration not include replacement of, expansion of or retrofitting the bridge. Traffic will come to an absolute halt. Additionally, the Ventura/Cahuenga Boulevard Corridor Specific Plan does not allow for traffic to be dumped out onto Ventura Blvd. or Cahuenga Blvd., thus this factor must be considered in any plan that involves Barham Blvd. and or the Barham Bridge. Additionally, the Project applicant must be responsible</td>
</tr>
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for any mitigation costs without the expectation of State or local funds.

Response to Comment No. 12-310

As noted in Response to Comment Nos. 12-171 and 12-172, above, the Project’s proposed traffic mitigation measures, including Mitigation Measures B-18 and B-19 described in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR fully mitigate the Project’s impacts at both intersections serving the Barham Boulevard bridge. The approved improvements have been reviewed and approved by the Los Angeles Department of Transportation as sufficient to mitigate the Project’s impacts at these intersections. Regarding the Ventura–Cahuenga Boulevard Corridor Specific Plan, the commenter is referred to Response to Comment No. 12-163, above. It should also be noted that the Project does not result in significant and unavoidable impacts along either the Ventura Boulevard or Cahuenga Boulevard corridors within the Ventura–Cahuenga Boulevard Corridor Specific Plan area. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-311

CONCLUSION - As stated earlier, this report represents DOT’s initial assessment of the project’s traffic impacts. Revisions or amendments to this letter may follow as the project proceeds through the environmental review and certification process, or if there are any revisions to the scope of the project. Under the current proposal, the project is expected to result in eight unmitigated traffic impacts after implementation of the proposed transportation mitigation program. Of these eight intersections, five are Eight unmitigated traffic impacts are mentioned; why is that acceptable?
The project should not leave any Significant Impacts of any kind after build out and all mitigation measures are in place.
expected to operate at a level-of-service (LOS) of D or better after build out of the project, and three are adjacent to the project site.

28

While mitigations are proposed at these locations that partially mitigate the project’s impacts, a significant impact still remains. To further reduce the number of unmitigated traffic impacts, consideration should be given to additional project alternatives that are of a reduced density and would, therefore, generate less traffic and result in less traffic impacts. Revisions or amendments to this letter may follow as the project proceeds through the environmental review and certification process, or if there are any revisions to the scope of the project. Under the current proposal, the project is expected to result in eight unmitigated traffic impacts after implementation of the proposed transportation mitigation program. Of these eight intersections, five are expected to operate at a level-of-service (LOS) of D or better after build out of the project, and three are adjacent to the project site. While mitigations are proposed at these

The three significant impacts that are adjacent to the property greatly affect the Island Neighborhood of Studio City and are unacceptable. The Project must be scaled back as to not create any significant impacts. Additionally, as stated earlier, Studio City is not on the Impacted Neighborhood list provided by the applicant. Studio City must be included as an impacted community on this list and the applicant must pay for all necessary neighborhood impacts during the construction phase of the 21 year build out.
locations that partially mitigate the project’s impacts, a **significant** impact still remains. To further reduce the number of unmitigated traffic impacts, consideration should be given to additional project alternatives that are of a reduced density and would, therefore, generate less traffic and result in less traffic impacts.

**Response to Comment No. 12-311**

The commenter is referred to Response to Comment No. 12-5, above, regarding significant and unavoidable impacts and alternatives that were analyzed in the Draft EIR that include less development than the proposed Project. Regarding neighborhood intrusion impacts, the commenter is referred to Response to Comment No. 12-142, above and Topical Response No. 7: Neighborhood Intrusion (see Section III.C, Topical Responses, of this Final EIR). The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-312**

See next page
Exhibits
Response to Comment No. 12-312

Specific comments contained in the Exhibits portion of the letter are provided and responded to below.

Comment No. 12-313

See next page
PROJECT DESCRIPTION
REQUESTED CITY OF LOS ANGELES ACTIONS

Project Location

The NBC Universal Evolution Plan property comprises approximately 391 acres (the “Project Site”), with approximately 95 acres located within the City of Los Angeles, and 296 acres in the unincorporated area of Los Angeles County. The Project Site is generally bounded by the Los Angeles River Flood Control Channel to the north, the Hollywood Freeway to the south (except for the southwest corner of the Project Site which abuts hotel and office towers), Barham Boulevard to the east (except in the area of the Hollywood Manor residential area), and Lankershim Boulevard and the Universal City Metro Red Line Station to the west. The Project Site has been extensively developed over the past 90 years, although the eastern area (the “Back Lot”) is currently underdeveloped.

Currently, the portion of the Project Site within City jurisdiction involves several non-contiguous areas surrounding the County portion. The three primary areas of the Project Site currently within City jurisdiction, proceeding clockwise from the northeast, are: (1) approximately 40 acres at the northeastern corner of the Project Site along Barham Boulevard; (2) approximately 11 acres at the southeastern corner of the Project Site along Barham Boulevard and Buddy Holly Drive; and (3) approximately 40 acres along the southern and southwestern portion of the Project Site, adjacent to the Hollywood Freeway and hotel and office towers, which also includes Universal Hollywood Drive and a limited amount of frontage along the north side of Universal Hollywood Drive. The portion of the Project Site currently within County jurisdiction is a contiguous area encompassing most of the northern, central and western portions of the Project Site.

Requested Actions

The Applicant seeks the following discretionary actions from the City of Los Angeles:

- General Plan Amendment/Designation to Regional Commercial and adding Universal City Specific Plan (UCSP) as a corresponding zone;
- Specific Plan Amendment to delete that sliver of the Project Site from within the Mulholland Scenic Parkway Specific Plan;
- Zone Change/Designation to Universal City Specific Plan (UCSP) and Code Amendment to add the Universal City Specific Plan (UCSP) zone;
- Establishment of the Universal City Specific Plan;
- Tentative Tract Maps for mixed-use development (residential and limited neighborhood commercial serving the residential development), including a range of residential types, small-lot subdivision and air space lots (with accompanying Design Guidelines), as well as production-related facilities and studio office uses in the western portion of the Project Site. The Tract Maps will include haul route permit and protected tree removal approvals;
- Development Agreement and Pre-Annexation Agreement;
- Establishment of Community Facilities/Mello-Roos Districts (acquisition and construction).
Response to Comment No. 12-313

Exhibit 1 appears to consist of a copy of an attachment to the City Master Land Use Application for the Project that is referenced in Comment No. 12-53. As such, the commenter is referred to Response to Comment No. 12-53, above.

Comment No. 12-314

See next page
Proposed Project

The Applicant is proposing the NBC Universal Evolution Plan (the "Project"), a conceptual plan encompassing the entire 391-acre property. As part of the Project, the Applicant seeks to develop 2,937 residential units, approximately 180,000 square feet of neighborhood retail and community-serving commercial, approximately 250,000 new square feet of studio office and approximately 50,000 new square feet of studio and studio technical support uses in the City portions of the Project Site. As part of the residential development, the Project will establish a Mello-Roos community facilities district (acquisition and construction). In addition, within the remaining County portion of the Site, the Applicant proposes the development of additional studio, office, theme park and entertainment retail (CityWalk), as well as an approximately 450,000 square-foot hotel with up to 500 rooms. The Applicant will seek separate discretionary actions and a separate specific plan from the County of Los Angeles to address development proposed within the County portion of the Project Site.

In addition to the proposed development, the Applicant is seeking approval from the Local Agency Formation Commission (LAFCO) to annex approximately 76 acres (primarily within the Back Lot area) from the unincorporated County into the City of Los Angeles. This will have the effect of placing all of the proposed residential development in the City. The Applicant also seeks to adjust the boundaries between the City and County in other small areas of the property where the boundary lines intrude into buildings and otherwise need adjustment. Accordingly, the Applicant is seeking approval for the detachment of approximately 32 acres of City land to the unincorporated County, which would result in an overall net change of 44 acres annexed from the County to the City. Upon completion of the annexation process, approximately 139 acres will be located within the City of Los Angeles and approximately 252 acres will be located within the unincorporated area of Los Angeles County.

Existing Setting at Project Site

The Project Site is currently used for studio production (e.g., movie, television and commercial), studio office, office, amphitheater, entertainment (e.g., theme park and tram tour), and entertainment retail uses. The site also includes a child care center. The Project Site currently consists of approximately 4.0 million square feet of development.

The Project Site also includes numerous production sets and the Universal Studio Tram Tour which do not account for floor area. In addition, during the public review process for the Project, it is anticipated that the Applicant would construct approximately 150,000 square feet of additional studio, studio office, theme park and CityWalk related facilities as part of its on-going business activities.

Land Use and Zoning Designation

The portions of the Project Site currently within the City of Los Angeles are located within the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan area, which designates the Project Site with various Residential and Commercial designations. Current Community Plan and zoning designations for the five portions of the Project Site located within the City are as follows: 1) the northeast area of the Project Site along Barham Boulevard is designated Limited Commercial and Very Low Density Residential, with corresponding zoning of C1 and RE20, respectively, and along the Los
Response to Comment No. 12-314

Exhibit 2 appears to consist of a copy of an attachment to the City Master Land Use Application for the Project that is referenced in Comment No. 12-56. As such, the commenter is referred to Response to Comment No. 12-56, above.

Comment No. 12-315

See next page
Angeles River Flood Control Channel near Barham Boulevard is designated Open Space; 2) the northwest area of the Project Site located along Lankershim Boulevard is designated Community Commercial with corresponding C2 zoning; 3) the southeast area of the Project Site along Barham Boulevard and Buddy Holly Drive is designated Very Low and Minimum Density Residential, with corresponding zoning of RE20 and RE40, respectively; 4) the southwestern area of the Project Site located along the Hollywood Freeway and adjacent to hotel and office towers is designated Regional Center, as well as Medium and Minimum Density Residential, with a variety of zoning designations including C2, PB, P, RE15 and RE40; and 5) a small portion of land along the north boundary in the middle of the Project Site, adjacent to the Los Angeles River Flood Control Channel, is designated Open Space, with R1 zoning. In addition, the southeast corner of the Project Site is located in the Outer Corridor of the Mulholland Scenic Parkway Specific Plan.

Within the County of Los Angeles, the portion of the Project Site occupied by studio uses is designated Major Industrial within the County’s General Plan Land Use Policy Map, with the balance of the Project Site within the County designated as Major Commercial. Corresponding County zoning is M-1½. Accordingly, the Back Lot portion of the Site which is proposed to be annexed to the City of Los Angeles is also currently within the County’s Major Industrial land use designation and M-1½ zoning.

Project Characteristics

The NBC Universal Evolution Plan proposes a development program that meets the future needs of the existing businesses located within the Project Site as well as the establishment of a new residential community that meets the future housing needs of the eastern San Fernando Valley in a manner that respects both its on-site and off-site neighbors. The Project proposes the development of additional studio, studio office, office, entertainment retail, and entertainment uses, as well as a hotel in the County portion of the Project Site. In addition, 2,937 residential dwelling units, approximately 180,000 square feet of neighborhood retail and community-serving commercial, approximately 250,000 new square feet of studio office and approximately 50,000 new square feet of studio and studio technical support uses would be constructed within the City portions of the Project Site. To accommodate the new commercial development, approximately 638,000 square feet of existing studio, office and entertainment uses would be demolished. The net new square footage of the proposed Project is approximately 2.01 million square feet of development, as well as 2,937 residential units. As part of the Project, the Universal Studio Tram Tour and a few sets would be removed from the Back Lot area and relocated within the Studio portion of the Project Site. The Project would concentrate this mix of employment, entertainment and housing activities within a regional center, which is located immediately adjacent to a regional transit station. The Project represents excellent urban planning design.
Response to Comment No. 12-315

Exhibit 3 appears to consist of a copy of an attachment to the City Master Land Use Application for the Project that is referenced in Comment No. 12-56. As such, the commenter is referred to Response to Comment No. 12-56, above.

Comment No. 12-316

See next page
### Table 31 (Continued)
Intersection Impact Summary

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<th>P.M. Peak Hour</th>
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<td>6</td>
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<tr>
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<td>Total Individual Intersections Impacted</td>
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### Future Without Project Conditions (Year 2030) - Before TOM Trip Reduction and Mitigations

**Intersection Peak Hour Levels of Service - Signalized Intersections**

<table>
<thead>
<tr>
<th>No.</th>
<th>Intersection</th>
<th>Peak Hour</th>
<th>Future without Project</th>
<th>Future with Project, Before TOM Trip Reduction and Mitigations</th>
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</table>
### Table 31 (Continued)

**Future With Project Conditions (Year 2030) – Before TDM Trip Reduction and Mitigations**

**Intersection Peak Hour Levels of Service – Signalized Intersections**

<table>
<thead>
<tr>
<th>No.</th>
<th>Intersection</th>
<th>Peak Hour</th>
<th>Future without Project</th>
<th>Future with Project, Before TDM Trip Reduction and Mitigations</th>
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### Table 31 (Continued)

#### Future With Project Conditions (Year 2030) – Before TDM Trip Reduction and Mitigations

**Intersection Peak Hour Levels of Service – Signalized Intersections**

<table>
<thead>
<tr>
<th>No.</th>
<th>Intersection</th>
<th>Peak Hour</th>
<th>Future without Project</th>
<th>Future with Project, Before TDM Trip Reduction and Mitigations</th>
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<tr>
<td>134</td>
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<td>A.M.</td>
<td>C.930</td>
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<tr>
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<td>A.M.</td>
<td>C.991</td>
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<td>138</td>
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<td>C.959</td>
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<td>139</td>
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<td>C.907</td>
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<tr>
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### Table 31 (Continued)

**Future With Project Conditions (Year 2030) – Before TDM Trip Reduction and Mitigations**  
Intersection Peak Hour Levels of Service – Signalized Intersections

<table>
<thead>
<tr>
<th>No.</th>
<th>Intersection</th>
<th>Peak Hour</th>
<th>Future without Project</th>
<th>Future with Project, Before TDM Trip Reduction and Mitigations</th>
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<td>148.</td>
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<td>0.736 C</td>
</tr>
<tr>
<td>149.</td>
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<tr>
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<tr>
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<tr>
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<td>0.664 B</td>
<td>0.724 C</td>
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</tbody>
</table>

---

**Notes:**

- Intersection is operating under the LADOT Adaptive Traffic Control System (ATCS). A credit of 0.10 in VIC ratio was included in the analysis.
- Denotes CMP arterial monitoring station.
- Traffic counts at this location were not fully representative of the situation due to downstream constraints and pedestrian conflicts. LOS is based on field observations and has not been calculated based on the Universal City Transportation Model.
- Intersection is connected to the City of Burbank's Traffic Signal Interconnect & Signal Timing System. A credit of 0.02 in VIC ratio was included in the analysis.

**Source:** Gibson Transportation Consulting, Inc., March 2010.
Response to Comment No. 12-316

Exhibit 4a consists of copies of Table 31 from the Draft EIR that are referenced in Comment No. 12-61. As such, the commenter is referred to Response to Comment No. 12-61, above.

Comment No. 12-317

See next page
neighborhood. For example, turn restrictions limit the ability of vehicles to move from the main corridor to the alternative neighborhood streets during peak hours; cul-de-sacs and street closures cut off the ability to connect to the main corridors; and speed humps and stop signs slow the travel time on neighborhood streets which eliminates the incentive to divert from the main corridor. However, traffic calming measures are also sometimes considered undesirable to a neighborhood because they may alter the neighborhood's character or annoy residents (e.g., having to stop at multiple intersections, reduced lanes, etc). Whether such measures are helpful or undesirable overall depends on each community's preferences and so it is inherently subjective unless and until a specific neighborhood intrusion impact is observed and studied, measures are developed to address the traffic intrusion, and the community is consulted and polled to determine the community's wishes. If the community does not support the mitigation actions, then they are deemed by the Los Angeles Department of Transportation policy to be infeasible and will not be imposed upon a community that does not want them.

Due to the uncertainties surrounding the potential neighborhood intrusion impact, including the uncertainty over whether any such impact will even occur, to be conservative, for purposes of this analysis, the potential impact is considered significant and a Neighborhood Traffic Management Plan process by which the potential impact can be identified and mitigated has been incorporated into the mitigation for neighborhood intrusion impacts (refer to subsection 5, Mitigation Measures). However, because it is possible that a significant impact may occur and that one or more neighborhoods might determine that it does not want to implement the mitigation actions, it is not possible to determine now whether such a potential neighborhood intrusion impact would be fully mitigated were it to occur. Accordingly, it is conservatively concluded that with the identified mitigation the potentially significant impact will not be fully mitigated. Accordingly, as a further step, this impact is treated as significant even after the implementation of all feasible mitigation measures.

Intersections along the arterial corridors that are projected to operate at Level of Service E or F under Future-with-Project conditions are also identified on Figure 73A on page 903.

As can be seen, corridors to which 1,200 or more daily trips are projected to be added by the Project, before Transportation Demand Management trip reduction and mitigations, include:

- Lankershim Boulevard between Ventura Boulevard/Cahuenga Boulevard and Camarillo Street/Vineland Avenue;
IV.B.1. Traffic/Access - Traffic/Circulation

- Cahuenga Boulevard between Lankershim Boulevard and the Ventura Freeway eastbound ramps;
- Riverside Drive between Evergreen Street/Alameda Avenue and Camarillo Street/Tujunga Avenue;
- Tujunga Avenue between Camarillo Street/Riverside Drive and the State Route 170 northbound on-ramp;
- Moorpark Way/Moorpark Street between Cahuenga Boulevard and Riverside Drive/Ledge Avenue;
- Barham Boulevard between Olive Avenue and Cahuenga Boulevard;
- Forest Lawn Drive between Barham Boulevard/Lakeside Plaza Drive and the Ventura Freeway eastbound ramps;
- Olive Avenue between Barham Boulevard and Hollywood Way;
- Pass Avenue between Olive Avenue and the Ventura Freeway eastbound off-ramp;
- Cahuenga Boulevard (East) between Barham Boulevard/Buddy Holly Drive and Mulholland Drive;
- Cahuenga Boulevard (West) between Lankershim Boulevard/Ventura Boulevard and Highland Avenue/Pat Moore Way;
- Highland Avenue between Cahuenga Boulevard (West)/Pat Moore Way and Sunset Boulevard;
- Ventura Boulevard between Lankershim Boulevard/Cahuenga Boulevard and the Hollywood Freeway southbound on-ramp;
- Ventura Boulevard between Riverton Avenue/Campo de Cahuenga Way and Fulton Avenue;
- Campo de Cahuenga Way between Lankershim Boulevard/Universal Hollywood Drive and Riverton Avenue/Ventura Boulevard; and
- Universal Studios Boulevard between Universal Center Drive/Buddy Holly Drive and Cahuenga Boulevard (West).

The presence of congested cumulative conditions and the availability of local street(s) providing a parallel route of travel in the vicinity of congested portions of the corridors were then investigated for each of the corridors. The following discusses the results of this investigation for each corridor:
IV.B.1. Traffic/Access - Traffic/Circulation

- Lankershim Boulevard between Ventura Boulevard/Cahuenga Boulevard and Camarillo Street/Vineland Avenue - 10 intersections along the Lankershim Boulevard corridor from Ventura Boulevard/Cahuenga Boulevard to Camarillo Street/Vineland Avenue are projected to operate at Level of Service E or F include:
  - Lankershim Boulevard at Vineland Avenue/Camarillo Street;
  - Lankershim Boulevard at Riverside Drive;
  - Lankershim Boulevard at Moorpark Street;
  - Lankershim Boulevard at Muddy Waters Drive;
  - Lankershim Boulevard at Valleyheart Drive/James Stewart Avenue;
  - Lankershim Boulevard at Main Street;
  - Lankershim Boulevard at Jimi Hendrix Drive;
  - Lankershim Boulevard at Campo de Cahuenga Way/Universal Hollywood Drive;
  - Lankershim Boulevard at Hollywood Freeway northbound off-ramp; and
  - Lankershim Boulevard at Ventura Boulevard/Cahuenga Boulevard.

No parallel alternative routes via local residential streets are available as a bypass to Lankershim Boulevard between the Muddy Waters Drive and Ventura Boulevard/Cahuenga Boulevard intersections, and around the Vineland Avenue/Camarillo Street intersection. Therefore, no significant neighborhood intrusion impacts in this area would be anticipated.

A potential alternative route that would avoid the Lankershim Boulevard & Moorpark Street intersection could be Woodbridge Street to Cartwright Avenue to Riverside Drive and back to Lankershim Boulevard. Therefore, there is a potential for a significant neighborhood intrusion impact in this area, before Transportation Demand Management Trip Reductions and before mitigation.

A potential alternative route that would avoid the Lankershim Boulevard & Riverside Drive intersection could be Landale Street to Vineland Avenue to Hortense Street. Therefore, there is a potential for a significant neighborhood intrusion impact in this area, before Transportation Demand Management trip reductions and mitigation.

- Cahuenga Boulevard between Lankershim Boulevard and the Ventura Freeway eastbound ramps – The four intersections along the Cahuenga Boulevard
corridor from Lankershim Boulevard to the Ventura Freeway eastbound ramps projected to operate at Level of Service E or F are:

- Cahuenga Boulevard at Ventura Freeway eastbound ramps;
- Cahuenga Boulevard at Riverside Drive;
- Cahuenga Boulevard at Moorpark Street; and
- Cahuenga Boulevard at Valley Spring Lane.

A potential alternative route that would avoid the Cahuenga Boulevard & Riverside Drive, Cahuenga Boulevard & Moorpark Street, and Cahuenga Boulevard & Ventura Freeway eastbound ramps intersections could be Valley Spring Lane to Ledge Avenue to Sarah Street and back to Cahuenga Boulevard. Therefore, there is a potential for a significant neighborhood intrusion impact in this area, before Transportation Demand Management trip reductions and mitigation.

No parallel alternative routes via local residential streets are available as a bypass to Cahuenga Boulevard around the Valley Spring Lane intersection. Therefore, no significant neighborhood intrusion impacts in this area would be anticipated.

- Riverside Drive between Evergreen Street/Alameda Avenue and Camarillo Street/Tujunga Avenue – The six intersections along the Riverside Drive corridor from Evergreen Street/Alameda Avenue to Camarillo Street/Tujunga Avenue projected to operate at Level of Service E or F are:
  - Riverside Drive at Camarillo Street/Tujunga Avenue;
  - Riverside Drive at Ventura Freeway eastbound on-ramp;
  - Riverside Drive at Lankershim Boulevard;
  - Riverside Drive at Cahuenga Boulevard;
  - Riverside Drive at Ledge Avenue/Moorpark Way; and
  - Riverside Drive at Forman Avenue.

No parallel alternative routes via local residential streets are available as a bypass to Riverside Drive around the Camarillo Street/Tujunga Avenue intersection. Due to the physical barriers created by the Ventura Freeway to the north and the presence of other Level of Service E or F intersections along Moorpark Street to the south, no parallel alternative routes via local residential streets are available as a bypass to Riverside Drive around the Ventura Freeway eastbound on-ramp, Lankershim Boulevard, and Cahuenga Boulevard.
IV.B.1. Traffic/Access - Traffic/Circulation

intersections. Therefore, no significant neighborhood intrusion impacts in this area would be anticipated.

A potential alternative route that would avoid the Ledge Avenue/Moorpark Way & Riverside Drive and Forman Avenue & Riverside Drive intersections could be Strohm Avenue to Moorpark Street to Talofa Avenue and back to Riverside Drive. Therefore, there is a potential for a significant neighborhood intrusion in this area, before Transportation Demand Management trip reductions and mitigation.

- Tujunga Avenue between Camarillo Street/Riverside Drive and the State Route 170 northbound on-ramp – The sole intersection along the Tujunga Avenue corridor from Camarillo Street/Riverside Drive to the State Route 170 northbound on-ramp projected to operate at Level of Service E or F is the intersection of Tujunga Avenue at Camarillo Street/Riverside Drive. No parallel alternative routes via local residential streets are available as a bypass to Tujunga Avenue around the Camarillo Street/Riverside Drive intersection. Therefore, no significant neighborhood intrusion impacts in this area would be anticipated.

- Moorpark Way/Moorpark Street between Cahuenga Boulevard and Ledge Avenue/Riverside Drive – The two intersections along the Moorpark Way corridor from Cahuenga Boulevard to Ledge Avenue/Riverside Drive projected to operate at Level of Service E or F are the intersections of Moorpark Street at Cahuenga Boulevard and Moorpark Way at Ledge Avenue/Riverside Drive. A potential alternative route that would avoid the Cahuenga Boulevard & Moorpark Street and Ledge Avenue/Moorpark Way & Riverside Drive intersections could be Bloomfield Street to Ledge Avenue to Moorpark Street to Placidia Avenue to Riverside Drive. Therefore, there is a potential for a significant neighborhood intrusion impact in this area, before Transportation Demand Management trip reductions and mitigation.

- Barham Boulevard between Olive Avenue and Cahuenga Boulevard – The six intersections along the Barham Boulevard corridor from Olive Avenue to Cahuenga Boulevard projected to operate at Level of Service E or F are:

  o Barham Boulevard at Cahuenga Boulevard;
  o Barham Boulevard at Buddy Holly Drive/Cahuenga Boulevard;
  o Barham Boulevard at De Witt Drive;
  o Barham Boulevard at Lake Hollywood Drive;
  o Barham Boulevard at Coyote Canyon Road; and
  o Barham Boulevard at Lakeside Plaza Drive/Forest Lawn Drive.
Response to Comment No. 12-317

Exhibit 4 consists of copies of pages 640–644 of the Draft EIR that are referenced in Comment No. 12-61. As such, the commenter is referred to Response to Comment No. 12-61, above.

Comment No. 12-318

See next page
SECTION 1: AUTHORITY AND SCOPE

Section 1.1 ESTABLISHMENT OF THE UNIVERSAL CITY SPECIFIC PLAN

A. A Specific Plan is a regulatory land use ordinance, which controls or provides a framework for the systematic implementation of the General Plan of the City of Los Angeles (City). The Universal City Specific Plan is hereby established and is applicable to that area of the City shown within the heavy dashed lines on the Universal City Specific Plan Map shown on Exhibit No. 1, including the Existing Southern Entry Point Sign located at the intersection of Universal Studios Boulevard and Cahuenga Boulevard. The Universal City Specific Plan area includes those portions of the property shown on Exhibit No. 1A to be detached from the County and annexed to the City.

B. In order to regulate the use of property as provided for in this Specific Plan, the Specific Plan is divided into one Existing Use Overlay, shown on Exhibit 4, and five Land Use Districts and one Overlay Subdistrict: (i) Open Space District No. 1; (ii) Open Space District No. 2; (iii) Open Space District No. 3; (iv) Mixed-Use Universal City District, and (v) Studio Production District. The Technical Support Overlay Subdistrict is located within the Mixed-Use Universal City District. The location and boundaries of these five Districts and one Overlay Subdistrict are shown on the Universal City Specific Plan Land Use Map, Exhibit No. 2.

Section 1.2 RELATIONSHIP TO THE LOS ANGELES MUNICIPAL CODE

A. The regulations of this Specific Plan are in addition to those set forth in the Los Angeles Municipal Code (Municipal Code), including the planning, zoning and subdivision provisions of the Municipal Code, and any other relevant ordinances; and do not convey any rights not otherwise granted under the provisions and procedures contained in Chapter I and other relevant ordinances, except as specifically provided herein.

B. Whenever provisions of this Specific Plan differ either in being more restrictive or less restrictive from provisions contained in the Municipal Code or other relevant ordinances, this Specific Plan shall supersede those other provisions. Whenever this Specific Plan is silent, the provisions of the Municipal Code or other applicable ordinances shall apply.

C. The regulations contained within this Specific Plan regarding floor area ratio, maximum densities, lot widths, lot area, building separations, and yards shall supersede any regulations within the Municipal Code or other relevant ordinances.

D. Without limiting the above paragraphs, the regulations and procedures in this Specific Plan shall supersede and serve as a substitute ordinance for the following provisions of the Municipal Code:

1. Site Plan Review. Section 16.05.
4. Hillside Slope Density Formula. Sections 17.05.C and 17.50.E.

6. Specific Plan Project Permit Compliance and Modifications. Sections 11.5.7.C and 11.5.7.D.

7. Specific Plan Exception, Amendment and Interpretation. Sections 11.5.7.F, 11.5.7.G and 11.5.7.H only with regard to the body with authority (i.e., the City Planning Commission shall have authority instead of the Area Planning Commission) and the time limitations for rendering a decision.


12. Recreation Fees. Sections 12.33 and 17.07.N.


18. Lighting Regulations. Sections 12.21.A.7(c) and 93.0117.


22. Residential Open Space Requirements for multi-family units. Sections 12.21G and 17.07.N.

23. Streetscape Regulations. Sections 12.37.H, 17.05.A through 17.05.B, 17.05.D through 17.05.E, and Chapter 1, Article 8.

24. Street Lighting Regulations. Section 17.08.C.

Section 1.3  RELATIONSHIP TO THE GENERAL PLAN

The General Plan is a comprehensive long-range policy document that guides the ultimate physical development of the City. The General Plan includes certain state-mandated elements related to land use, circulation, housing, conservation, open space, noise, and safety. Whereas the General Plan is a broad policy document, a specific plan is a policy statement and implementation tool that is used to address a single project or planning area. A specific plan must be consistent with the General Plan by furthering the objectives and policies of the General Plan, and not obstruct their attainment, pursuant to California Government Code Section 65454.

The Specific Plan is consistent with the land use; housing; urban form and neighborhood design; open space and conservation; and transportation goals and objectives of the General Plan including the Framework Element. Identified as a Regional Center on the Framework Element’s Land Use Diagram, a Regional Center is an area in which services and land uses are concentrated, and includes offices, retail, restaurants, telecommunication centers, entertainment, major cultural facilities, hotels, major transit facilities, multi-family housing, and small parks and other community oriented activity facilities.

Section 1.4  RELATIONSHIP TO THE COMMUNITY PLAN

A Community Plan is a focused planning policy document that designates the distribution of types, amounts, and location of land uses for a particular area of the City. The Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan is one of 35 Community Plans that comprise the Land Use Element of the General Plan. The Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan is applicable to the Universal City Specific Plan area. The Community Plan is consistent with the objectives and policies of the General Plan; the Specific Plan is a more focused regulatory document that is consistent with both the Community Plan and General Plan and reflects the unique constraints and opportunities of the Specific Plan area. The Specific Plan creates a regulatory framework that accounts for the special needs of the Specific Plan area and the surrounding community, and allows flexibility for adapting to future changes that could occur in public and private industries and markets.

Section 1.5  RELATIONSHIP TO CEQA

Pursuant to the California Environmental Quality Act (CEQA), the NBC Universal Evolution Plan Environmental Impact Report (EIR) was prepared for the NBC Universal Evolution Plan, which includes the implementation of the Universal City Specific Plan. The EIR (SCH No. 2007071036) identifies potential effects on the environment of the NBC Universal Evolution Plan project and sets forth mitigation measures to lessen those impacts.
Response to Comment No. 12-318

Exhibit 5 consists of a copy of pages 6–8 of the October 15, 2010, draft of the proposed Universal City Specific Plan attached as Appendix A-1 to the Draft EIR, which is referenced in Comment No. 12-67. As such, the commenter is referred to Response to Comment No. 12-67, above.

Comment No. 12-319

See next page
Height Zone Key Map

- Project Boundary
- Height Zones (All heights are expressed in MSL)
- (750) Height Exception
- District Boundaries

Source: Matrix Environmental, 2010.

Height Zones
855'
848'
843'
Setback Area
(No building permitted)

Figure 173
Maximum Allowable Heights
Pursuant to Mitigation Measure E.1-4
Response to Comment No. 12-319

Exhibit 6a is a copy of Figure 173, page 1231, of the Draft EIR that is referenced in Comment No. 12-70. As such, the commenter is referred to Response to Comment No. 12-70, above.

Comment No. 12-320

See next page
Figure 38
Proposed Height Zones Map

Note:
1. Height Exceptions not allowed within Open Space District 3.

Source: ESRI Streetmap; County of Los Angeles; Ross Clement Hale Studios, September 2010; and Matrix Environmental, 2010.
Response to Comment No. 12-320

Exhibit 6b is a copy of Figure 38, page 557, of the Draft EIR that is referenced in Comment No. 12-70. As such, the commenter is referred to Response to Comment No. 12-70, above.

Comment No. 12-321

See next page
PLANNING SUBAREA 1
625' MSL Maximum Height

PLANNING SUBAREA 2
645' MSL Maximum Height
750' MSL Height Exception
Maximum 2 Building Exceptions

PLANNING SUBAREA 3
800' MSL Maximum Height
850' MSL Height Exception
Maximum 2 Building Exceptions

PLANNING SUBAREA 4
800' MSL Maximum Height
890' MSL Height Exception
Maximum 4 Building Exceptions

PLANNING SUBAREA 5
850' MSL Maximum Height

PLANNING SUBAREA 6
825' MSL Maximum Height

PLANNING SUBAREA 7
855' MSL Maximum Height
900' MSL Height Exception
Maximum 2 Building Exceptions

PLANNING SUBAREA 8
855' MSL Maximum Height
890' MSL Height Exception
Maximum 1 Building Exception

PLANNING SUBAREA 9
855' MSL Maximum Height

PLANNING SUBAREA 10
850' MSL Maximum Height

PLANNING SUBAREA 11
700' MSL Maximum Height

PLANNING SUBAREA 12

PLANNING SUBAREA 13

OPEN SPACE DISTRICT 3

LOS ANGELES RIVER FLOOD CONTROL CHANNEL

Note:
1. Height Exceptions not allowed within Open Space District 3.

Source: ESRI Streetmap; County of Los Angeles;
Rios Clemente Hale Studios, 2010;
and Matrix Environmental, 2010.

Figure 41
Planning Subareas and Height Limits Map

matrix
environmental
Response to Comment No. 12-321

Exhibit 6c is a copy of Figure 41, page 563, of the Draft EIR that is referenced in Comment No. 12-70. As such, the commenter is referred to Response to Comment No. 12-70, above.

Comment No. 12-322

See next page
EXHIBIT No. 2 - UNIVERSAL CITY SPECIFIC PLAN LAND USE MAP

LEGEND

- MIXED-USE UNIVERSAL CITY DISTRICT
- STUDIO PRODUCTION DISTRICT
- OPEN SPACE DISTRICT No. 1
- OPEN SPACE DISTRICT No. 2
- OPEN SPACE DISTRICT No. 3
- TECHNICAL SUPPORT OVERLAY SUBDISTRICT (PART OF MIXED-USE UNIVERSAL CITY DISTRICT)
Response to Comment No. 12-322

Exhibit 7 is a copy of Exhibit No. 2—Universal City Specific Plan Land Use Map from the October 15, 2010, draft of the proposed Universal City Specific Plan (Appendix A-1 to the Draft EIR), which is referenced in Comment No. 12-74. As such, the commenter is referred to Response to Comment No. 12-74, above.

Comment No. 12-323

See next page
Response to Comment No. 12-323

Exhibit 8a appears to be a copy of the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan from the City's General Plan Land Use Map, with notations added by the commenter regarding changes that may have occurred to the City's General Plan Land Use Map, and is referenced in Comment No. 12-100. As such, the commenter is referred to Response to Comment No. 12-100, above.

Comment No. 12-324

See next page
23. **Mini-Shopping Centers and Commercial Corner Development.** (Amended by Ord. No. 175,223, Eff. 6/30/03.) If the requirements set forth in Paragraph (a) and the conditions set forth in Paragraph (b) of this subdivision are met, and the proposed use or uses are not enumerated in Section 12.24 W.27., then a conditional use approval pursuant to Section 12.24 W.27. shall not be required for any new use, change of use or addition of floor area to a Mini-Shopping Center or a Commercial Corner Development.

(a) **Development Standards.**

(1) **Height.** Buildings or structures located in Height District Nos. 1 thru 11 shall not exceed a maximum height of 45 feet. However, buildings or structures shall comply with the provisions of Section 12.21 A.1.

(2) **Front Yard.** The front yard requirements set forth in Sections 12.12.2 C., 12.13 C.1. and 12.13.5 B.1. of this Code shall not apply to Mini-Shopping Centers or Commercial Corner Developments.

(3) **Windows.** The exterior walls and doors of a ground floor containing non-residential uses that front adjacent streets shall consist of at least fifty percent transparent windows, unless otherwise prohibited by law.

(4) **Parking.**

(i) Notwithstanding Section 12.21 A.5.(h) of this Code to the contrary, no tandem parking shall be permitted, except those spaces reserved exclusively for residential use.

(ii) Bicycle parking shall be provided as required by Section 12.21 A.16. of this Code.

(iii) Parking in the Downtown Business District shall be provided as required by Section 12.21 A.4.(i) of this Code.

(5) **Lighting.** All public areas of the lot or lots not covered by a building shall have night lighting for safety and security. All other open exterior areas, such as walkways and trash areas, shall have low-level, security-type lighting. All exterior lighting shall be directed onto the lot or lots, and all flood lighting shall be designed to eliminate glare to adjoining properties. All parking areas shall have a minimum of 3/4 foot-candle of flood lighting measured at the pavement.

(6) **Signs.**

(i) In addition to the requirements set forth in Division 62 of this Code, no person shall erect on the lot or lots the following signs, as defined in Section 91.6203 of this Code without first obtaining a conditional use permit: pole signs; projecting signs; or roof signs.
## Height District Quick Reference Chart

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**NOTE:** Specific Plan, HPOZ or Tract conditions shall take precedence over the height restrictions and may increase or decrease the maximum height for a given property.

**Transitional Height:** Portions of buildings in C or M zones within a certain distance of RW1 or more restrictive zones shall not exceed the following height limits, in accordance with Section 12.21.1 A 10 of the Zoning Code.

![Height Chart Diagram](image-url)

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CNN (Century City North) Height District - Sec. 12.21.2
CCS (Century City South) Height District - Sec. 12.21.2
CRA (Community Redevelopment Agency) Height District - Sec. 12.21.3
EZ (Enterprise Zone) Height District - Sec. 12.21.4
CSA (Centers Study Area) Height District - Sec. 12.21.5

† May exceed height limit to meet average height of 40% or more of dwellings on both sides of same street for the length of the block.
† A building designed and used entirely for residential purposes shall only be limited to the number of feet in height.

Page 923
Response to Comment No. 12-324

Exhibit 8b appears to be a copy of a portion of the Los Angeles Municipal Code. Exhibit I-17-1 appears to be a copy of a City of Los Angeles document summarizing height and FAR limits for all LAMC residential zones. These documents are referenced in Comment No. 12-100. As such, the commenter is referred to Response to Comment No. 12-100, above.

Comment No. 12-325

See next page
1A Universal Mixed-Use Sign District
1B Universal City Town Center Sign District
2A Studio Administration Sign District
2B Studio Technical Lot Sign District
2C Universal City Southern Entry Point Sign
2D Universal City Barham Sign

LOS ANGELES RIVER FLOOD CONTROL CHANNEL

Figure 20
City Sign Districts

Source: Reilly & Reilly 2019

Universal City

STUDIO PRODUCTION DISTRICT

matrix environmental

Page 925
Response to Comment No. 12-325

Exhibit 9 is a copy of Figure 20, page 323, of the Draft EIR that is referenced in Comment No. 12-102. As such, the commenter is referred to Response to Comment No. 12-102, above.

Comment No. 12-326

See next page
Response to Comment No. 12-326

Exhibit 9a is a copy of Figure 10, page 281, of the Draft EIR that is referenced in Comment No. 12-102. As such, the commenter is referred to Response to Comment No. 12-102, above.

Comment No. 12-327

See next page
ROLE OF THE COMMUNITY PLAN

The Community plan is intended to promote an arrangement of land uses, streets, and services which will encourage and contribute to the economic, social and physical health, safety, welfare, and convenience of the people who live and work in the community. The plans are also intended to guide development in order to create a healthful and pleasant environment. Goals, objectives, policies, and programs are created to meet the existing and future needs and desires of the community through the year 2010. The general plan clarifies and articulates the City's intentions with respect to the rights and expectations of the general public, property owners, and prospective investors and business interests. Through the Community Plan, the City can inform these groups of its goals, policies, and development standards, thereby communicating what is expected of the City government and private sector to meets its objectives.

The Community Plan ensures that sufficient land is designated which provides for the housing, commercial, employment, education, recreational, cultural, social, and aesthetic needs of the residents of the plan area. The Plan identifies and provides for the maintenance of any significant environmental resources within the Plan Area. The Plan also seeks to enhance community identity and recognizes unique neighborhoods within the Plan area.

PURPOSE OF THE COMMUNITY PLAN

The last comprehensive update of the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan was completed in 1988 through the General Plan Consistency Program required by AB283. In the past 20 years the community has shown a smaller growth rate than the overall rate for the city. During the 1970's the community population decreased by 4,268 residents, a decline of 6.2%. Since 1980 the community's population has grown by 3,829 residents representing an average growth of 6.1%. During this time, considerable growth has occurred, new issues have emerged, and new community objectives regarding the management of new development and community preservation have evolved. Consequently, it is necessary to update the Community Plan to not only reflect current conditions, but to accurately reflect the prevailing visions and objectives of the area's residents and property and business owners.

This Community Plan was developed in the context of promoting a vision of the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass area as a community that looks at its past with pride and approaches its future with eagerness, while maintaining its individual identity by

- Preserving and enhancing the positive characteristics of existing residential neighborhoods while providing a variety of compatible new housing opportunities.
Response to Comment No. 12-327

Exhibit 10 is a copy of a portion of the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan that does not appear to be referenced in the body of the comment letter. However, the commenter is referred to Response to Comment No. 12-104, above, regarding consistency with the Community Plan. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-328

See next page
- Access and proximity to employment.
- Potential for residential and mixed use development along commercial corridors.
- Undeveloped or underdeveloped land may allow opportunities for clustered development.
- Potential for appropriately scaled new housing in proximity to new transit facilities.

**COMMERCIAL**

**Issues**

- Lack of continuity of complementary uses and cohesiveness along commercial frontages.
- Lack of overall parking and access within commercial strips due to such physical constraints as shallow commercial lot depths.
- Unsightliness of new construction due to the lack of landscaping, architectural character and scale.
- Inadequate transition between commercial and residential uses.

**Opportunities**

- Support for efforts to preserve and rehabilitate commercial and residential historic structures when located on commercial sites.
- Establish appropriate transitions between commercial (mixed use) and adjoining uses, especially residential.
- Create pedestrian/friendly shopping areas by incorporating street trees, benches, convenient parking/access, and maintaining retail frontage at ground level.
- Through developing design standards that complement the

**INDUSTRIAL**

**Issues**

- To ensure that industrially zoned properties are located north of Ventura Boulevard.
- To provide adequate protection for residentially zoned properties adjacent to industrial uses.
Response to Comment No. 12-328

Exhibit 10a is a copy of a portion of the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan that is referenced in Comment No. 12-104. As such, the commenter is referred to Response to Comment No. 12-104, above, regarding consistency with the Community Plan.

Comment No. 12-329

See next page
Continued development of Equestrian, Hiking and Bicycle Trails.

Opportunities

- Continued efforts to establish State and local park sites within the hillside areas.

Several areas have been identified as major opportunity sites: Properties located along the south side of the Los Angeles River between Coldwater Canyon and Laurel Canyon; Transit Station site along Lankershim Boulevard, north of Ventura boulevard, adjacent to Universal City; the Studio City Golf Course; and, CBS Studios. Additionally, the properties located on the westerly side of Sepulveda Boulevard (including the Sherman Oaks Galleria) from the 101 Freeway to Valley Vista Boulevard. The designation has been applied to areas which will potentially generate significant community wide impacts.

Properties Along the South Side of the Los Angeles River

The properties located along the Los Angeles River from Coldwater to Laurel Canyon represent a series of development sites, with the potential for unique recreational opportunities and to create a significant physical and visual impact on adjacent properties. The following is a summary of major issues which should be considered for any future development of these sites.

Issues

- Activity generated from river use and from the businesses fronting along the river.

- The introduction of recreational activities adjacent to well maintained single-family neighborhoods.

- Potential for additional policing problems.

Opportunities

- The need for open space opportunities.

- The opportunity for the community to utilize the frontage along the Los Angeles River to meet its needs.

Transit Station

The transit station site is located on the west side of Lankershim Boulevard, adjacent to Universal City. The site currently contains a historical structure, Campo de Cahuenga with its early California Spanish style architecture, should serve as the predominant architectural style for this important gateway to the Valley. The following is a summary of major issues which should be considered for any future development of the site.
Response to Comment No. 12-329

Exhibit 11 is a copy of a portion of the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan that is referenced in Comment No. 12-105. As such, the commenter is referred to Response to Comment No. 12-105, above.

Comment No. 12-330

See next page
TRANSPORTATION

- Ensure that the CBS Studio Center site, if vacated reverts to a less intense zone compatible with surrounding properties.

Opportunities

- Expand manufacturing uses that generate employment for the local work force.
- Attract desirable ("clean") industrial uses, thus generating less harmful pollutants and lower noise levels.
- Providing appropriate administrative review for major expansions of existing industrial sites when located near residential uses.
- Excellent access to regional freeways and rail services.
- Availability of sites planned for job producing uses that improve the economic and physical condition of the area.

Issues

- Metro rail transit lines from Union Station to North Hollywood are proposed to serve the Plan Area, representing some of the largest capital improvement impacts on the area.
- The proposed Compo de Cahuenga Transit Station site contains an historical structure (Campo de Cahuenga). Development of the transit station site must retain the Early California Spanish Architecture in order to form a historical link with Campo de Cahuenga, a significant structure from California's past.

Opportunities

- Potential for joint development between private and public sectors to integrate, optimize and coordinate new construction.
- Preservation of historic structures.
- Potential to incorporate needed facilities conveniently near station stops such as child care, senior housing, and art craft districts.
- Potential to reflect and enhance community identity with themes for each station stop.

RECREATION AND PARKS AND OPEN SPACE

Issues

- Addition, expansion and/or improvement of needed local parks throughout the Community should be accelerated, where feasible.
Response to Comment No. 12-330

Exhibit 12 is a copy of a portion of the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan and does not appear to be referenced in the body of the comment letter. The commenter is referred to Response to Comment No. 12-106, above, regarding the Community Plan and Exhibit 12.

Comment No. 12-331

See next page
Issues

- The increase in traffic volume in the vicinity.
- The establishment of high traffic generating uses on the site.
- The establishment of retail uses not compatible with the single-family uses located to the north of the site.

Opportunities

- Integrating the development of the transit station with properties located north along Lankershim.
- Establish design features that continue the early California Spanish style.

Studio City Golf Course

The Studio City Golf Course is on approximately a 17 acre site located north of the Los Angeles River on the west side of Whitsett Avenue. The site is developed with a 9 hole pitch and put golf course, driving range and 20 tennis courts. In the past there has been intense pressure from the property for a different use. The following is a summary of major issues which should be considered for any future reuse of the site.

Issues

- Possible future alternative development of the site compatible with the surrounding area.
- Lack of public funding to convert the site to a public park.

Opportunities

- Establish the proper zoning for the property that is consistent with surrounding development.
- Consider the site as a key access site for the future development of the Los Angeles River.
- Consider design features that encourage waterfront access to the Los Angeles River.

CBS Studio Center

The CBS Studio Center is located north of Ventura Boulevard between Radford Avenue and Colfax Avenue. The site is the largest industrial piece of property in the plan area. It contains various sound stages that are used for taping of television and motion picture programs. The northerly 11.5 acre portion of the site provides for seven additional movie sound stages, production support buildings, and a bridge spanning the Los Angeles River.
Response to Comment No. 12-331

Exhibit 13 is a copy of a portion of the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan that is referenced in Comment No. 12-107. As such, the commenter is referred to Response to Comment No. 12-107, above.

Comment No. 12-332

See next page
• New development that complements significant historic structures.

Opportunities

• Development of areas adjacent to transit stations stops provide opportunities to enhance community identity.

• Potential for appropriately scaled new housing in proximity to transit facilities.

• Inclusion of mixed use development in commercial areas adjacent to transit station stops.

• Development of specific design guidelines for areas located near transit rail service endpoints.
Response to Comment No. 12-332

Exhibit 13a is a copy of a portion of the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan that does not appear to be referenced in the body of the comment letter. Exhibit 13a appears to be included to highlight an Opportunities statement in the Introduction chapter of the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan regarding design guidelines for commuter rail service and transit station stops without stating why the statement is highlighted. The commenter is also referred to Response to Comment No. 12-107. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-333

See next page
California to keep its 53 congressional seats

By Lisa Vorderbrueggen
Contra Costa Times

Posted: 12/22/2010 08:44:30 AM PST
Updated: 12/28/2010 09:27:45 AM PST

California will retain its 53 congressional seats, failing for the first time since the 1930 census to add to its numbers in the House of Representatives after the release of the decennial census figures.

Instead, states in the South and West, where growth rates outstripped the Golden State, will add to their ranks and political clout, the U.S. Census Bureau announced Tuesday morning.

Texas, whose population expanded 20 percent in the past decade, will add four seats to its political arsenal. Florida will bump up its rolls by two, while Arizona, Georgia, Nevada, South Carolina, Utah and Washington will add one representative apiece.

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"For a long time, that was the fear in California," Cain said. "It was never in the cards to add a seat. But if you have to reduce a number, it's like musical chairs where you have to put out a chair and you leave one member of Congress sitting on the lap of another member."

New York and Ohio, as analysts predicted, lost two members each.

Among the losers of one seat apiece are Illinois, Iowa, Louisiana, Massachusetts, Michigan, Missouri, New Jersey and Pennsylvania.

The reapportionment numbers reflect the regional population trends of the past decade, said Census Bureau Director Robert Groves at a news conference at the National Press Club in Washington, D.C.

For the first time in U.S. history, the population of the West, 71.9 million, exceeded that of the Midwest, at 66.9 million, Groves said. The West and South grew by about 14 percent while the Northeast and Midwest saw far more modest growth rates, from 3 to 4 percent.

Reapportionment is the constitutionally mandated process under which the 435 seats in the House of Representatives are divided among the 50 states based on the resident population count each decade.

The figure includes overseas military personnel and all residents, including those living in the U.S. illegally, as of April 1, 2010.

Every state is initially assigned one seat, and a calculation called the Method of Equal Proportions is applied to the remaining 385 seats.

The average population of a congressional district has grown to 710,767, a nearly 10 percent increase compared with the fastest growing state, Nevada, at 35 percent. The economic downturn hit California particularly hard as people turned to states with a lower cost of living, said UC Berkeley Washington Center Director Bruce Cain.

But California didn't lose a seat, a possibility national demographic analysts had presaged in recent months.

"For a long time, that was the fear in California," Cain said. "It was never in the cards to add a seat. But if you have to reduce a number, it's like musical chairs where you have to put out a chair and you leave one member of Congress sitting on the lap of another member."

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The average population of a congressional district has grown to 710,767, a nearly 10 percent increase.
Reapportionment should not be confused with redistricting, the process by which political boundaries are redrawn within a state after the decennial census.

Californians are unusually well-informed about redistricting these days, thanks to several successful ballot measures that stripped the Legislature of the job of drawing political maps.

The independent Citizens Redistricting Commission, a temporary panel of 14 nonelected Californians, will craft the boundaries for the state’s 53 congressional, 120 legislative and four Board of Equalization districts. The commission finalized its roster last week.

The Census Bureau will not release until probably late March the detailed numbers down to the block level the redistricting commissioners need to do their work. The bureau will start rolling out state-by-state tables in February, but California is usually last.

Nonetheless, there has been ample speculation about how California’s population shifts will drive the political landscape of the next decade.

Scholars at the conservative-leaning Rose Institute of State and Local Government at Claremont College, in a study based on population estimates, found that California’s population center continues to shift from its traditional coastal metropolitan regions toward inland communities.

The Census Bureau’s numbers reflect actual counts rather than estimates, and the outcome could be much different. But if the census figures uphold the Rose Institute’s findings, the trend could have significant consequences for Bay Area lawmakers.

Six of the 10 congressional districts in the nine-county Bay Area have lost population in the past decade.

Democratic House Speaker Nancy Pelosi, of San Francisco, represents the smallest congressional district in California and its boundaries must expand in the 2011 redistricting plan in order to preserve equal representation. Also underpopulated are the districts of Reps. Barbara Lee, of Oakland; George Miller, of Martinez; Lynn Woolsey, of Santa Rosa; Jackie Speier, of San Mateo; and Anna Eshoo, of Palo Alto.

In the California Senate, the state’s four most underpopulated districts are in the Bay Area, according to the Rose Institute’s analysis, including seats held by Leland Yee and Mark Leno, both of San Francisco; Joe Simitian, of Palo Alto; and Loni Hancock, of Berkeley.

Nine of the 18 Assembly districts in the Rose study show under-population, including in the East Bay.
California to keep its 53 congressional seats - San Jose Mercury News

seat held by Sandre Swanson, of Alameda.

In 2001 and most prior decades, legislators adopted redistricting plans that kept sitting lawmakers in their home districts and preserved or improved the incumbents’ party registration advantage. The self-serving nature of the 2001 maps, in particular, fueled critics, who were ultimately successful in their repeated ballot-box efforts to end the practice.

"With California's new Citizens Redistricting Commission now in charge of the state's redistricting process, incumbent legislators will no longer be able to control the effects of regional changes in California's population," the Rose Institute scholars wrote.

Contact Lisa Vorderbrueggen at 925-945-4773, IBABuzz.com/politics or Twitter.

- Interactive national map: http://2010.census.gov/2010census/data

Reapportionment: Q-and-A

What is reapportionment? The process by which the United States divides the 435 seats in the House of Representatives among the 50 states.

Why do we reapportion? The House of Representatives is based on a "one person, one vote" principle, therefore the country must periodically reallocate its representatives to reflect population changes.

When do we reapportion? Every 10 years, after the release of the results of the decennial U.S. census.

How is reapportionment done? The U.S. Census Bureau initially assigns one seat to every state and then applies to the remaining 385 seats a formula called the Method of Equal Proportions. Read the formula at http://www.census.gov/population/apportionment/about/computing.html.

When do the new congressional numbers go into effect? The new apportioned House of Representatives will convene in 2013 and its members and candidates for the seats will seek election under the revised numbers in 2012.

What is the difference between reapportionment and redistricting? Reapportionment is the process by which the United States divides the 435 House seats among the states. Redistricting is the process by which states draw political boundaries within state lines.

Source: U.S. Census Bureau
Response to Comment No. 12-333

Exhibit 14 is a copy of an article from the *Mercury News* that is referenced in Comment No. 12-115. As such, the commenter is referred to Response to Comment No. 12-115, above.

Comment No. 12-334

See next page
Mixed Use, Stacked Flats & Townhouses Below Street Grade

SE23. Where open air garages or occupied spaces are below the sidewalk grade, they should be set back enough distance to provide daylighting/open air while allowing for landscaping.

Where open air garages or occupied spaces are below the sidewalk grade, terraced steps and planting can ease the transition in an artistic gesture.
Response to Comment No. 12-334

Exhibit 15 is a copy of a page from the proposed Universal City Design Guidelines attached as Appendix 2 to the proposed Universal City Specific Plan (Appendix A-1 to the Draft EIR) that is referenced in Comment No. 12-117. As such, the commenter is referred to Response to Comment No. 12-117, above.

Comment No. 12-335

See next page
Response to Comment No. 12-335

Exhibit 16 is a copy of a Google map of the Project Site vicinity that is referenced in Comment No. 12-122. As such, the commenter is referred to Response to Comment No. 12-122, above.

Comment No. 12-336

See next page
California's got seven of them. Will voters finally help clean the Golden State's brown air?

By Christopher Helman, Forbes.com
Nov 16, 2010

At the ballot box this November California voters showed that they are determined to clean up their state's deplorable air quality. They quashed Proposition 23, which would have temporarily suspended key emissions-reduction tenets in the Golden State's Global Warming Solutions Act of 2006. How temporarily? Until pigs fly, or rather until the state unemployment level dropped to 5.5%—from the 12.4% it's at now.

Having survived the challenge (62% of voters rejected Prop 23) the emissions cuts are now set to begin in 2012. A carbon cap-and-trade program will be launched later. The goal is that, in eight years, California will have greenhouse gas emissions 15% lower than they are now.

In Pictures: America's 10 Dirtiest Cities

Click here to see the full list of America's 10 Dirtiest Cities

That's good news for the lungs of Californians. The American Lung Association, in its report State Of The Air 2010, finds seven California metropolitan areas with air quality bad enough that they make it onto the list of the Top 10 Dirtiest Cities in America. The 20 million people in these cities are at higher risk of asthma and chronic bronchitis.

Most of those souls (17.8 million) inhabit the Los Angeles, Long Beach and Riverside area, which ranked second-worst overall and worst in ozone pollution. Aside from millions of cars on the roads, the area also suffers the effects of the nation's busiest port. Researchers at the University of Calgary found in 2008 that salty coastal air mixed with sunshine and pollutants helps create unexpectedly high levels of ground-level ozone.

The biggest problem spot in the country is California's San Joaquin Valley, where farming, industry, car culture and topography collide to trap smog. Wildfires contribute to the problem. Severe particle pollution in valley burgs like Bakersfield (the center of California's oil industry and the metropolitan area with the worst air in the nation), Fresno (third place), Visalia (fourth) and Modesto (eighth) can damage the lungs in the same way cigarettes do. Sacramento (ninth) incentivizes residents to trade in gasoline lawn mowers for electric ones, diesel-powered trucks for hybrid ones and old wood stoves for new ones. The only non-California cities in the top 10: Pittsburgh, Pa; Birmingham, Ala.; and metropolitan Phoenix, Ariz.

It's hard to argue against cleaner air. Thus the debate leading up to the vote on Prop 23 was effectively framed as good vs. evil. On the good side were environmentalists and the sensitive pink lungs of asthma-prone children. On the evil side: power plants, oil refiners and diesel truck drivers.

The biggest backers of Prop 23 were Texas-based oil companies like Tesoro and Valero Energy and Koch Industries (owned by the Tea Party-backing billionaire Koch brothers), all of which have operations in California. Valero, for its part, put up $5 million for a media campaign attempting to convince California that the Global Warming Solutions Act is a job-killer. So too did truck drivers.
who spew particulates from their diesel engines while hauling loads to and from the Port of Long Beach.

If only those workers knew that their jobs were killing them. The American Lung Association says that truck drivers, dock workers and railroad workers who inhale diesel exhaust are much more likely to die from lung cancer and heart disease than the general population.

Under the law, refiners will have to foot the bill for pollution control technology at their plants, and will also have to provide even cleaner automotive fuels than California already mandates. Valero, which owns two refineries in the state and employs 1,600 workers there, will be able to pass on some of those costs to motorists, but higher fuel prices will almost certainly mean less demand for fuel. Cars are thought to be responsible for as much as 30% of California's greenhouse gas emissions.

They didn't get any sympathy from Gov. Arnold Schwarzenegger, who opposed Prop. 23—and who signed the original 2006 global warming legislation. Last week Schwarzenegger, wearing a pair of tough-looking cowboy boots, celebrated the vote and lambasted the oil companies: "We made it clear if those interests push us around," he said, "we'll push back."

The trouble will come if that push-back pushes industry out of the state altogether. Prop 23 supporters insist that a bevy of new taxes on energy will raise the costs of doing business enough to drive companies and jobs out of California. The green crowd insists the Global Warming Solutions Act will spur a clean energy boom in the state—with Californians putting their entrepreneurial talents toward inventing new solar panels, wind turbines and the like.

Some of the biggest opponents of Prop. 23 were Thomas Steyer, whose Fallon Capital Management hedge fund says it invests in areas that will become profitable "due to a catalyzing event or change in circumstances, including regulatory or legislative change." Steyer was joined by billionaires including John Doerr, rainmaker at green-tech venture capital shop Kleiner Perkins.

One company set to benefit from the law is SPG Solar, California's second-biggest solar panel installer. SPG will likely be hiring more installers in the years to come—but will the real boom in green jobs be in California? SPG President Tom Rooney tells Forbes he's thinking of opening a panel factory in China.

Even if green energy companies don't take their manufacturing overseas, there's little reason to build factories in high-tax California. Better to invest in low-tax Texas, which already boasts the world's highest concentration of energy companies, in Houston (a perennial polluter check-a-block with refineries), which narrowly escaped the top 10 Dirtiest Cities cut.

With any potential for a nationwide carbon cap-and-trade scheme now crushed by Republicans taking over the House of Representatives, America will be watching California for cues on whether greenhouse gases can be ameliorated without killing economic growth.

Our lungs hope for the best. According to the Lung Association 175 million Americans live in counties where outdoor air quality earned a grade of F. And if the Global Warming Solutions Act does end up being a job-killer, at least there's a bright side—unemployed Californians will have cleaner air to breathe.

Top 5 Dirtiest Cities in America

No. 1: Bakersfield, Calif.
Population: 800,000
Short-term particle pollution rank: 1
Year-round particle pollution rank: 2
Ozone pollution rank: 2
Hot, dusty and surrounded by California's San Joaquin Valley oil fields, Bakersfield has all the ingredients for the worst air in the nation

No. 2: Los Angeles-Long Beach-Riverside, Calif.
Population: 17.8 million
Short-term particle pollution rank: 4
Year-round particle pollution rank: 3
Ozone pollution rank: 1
University of Calgary researchers found in 2008 that salty coastal air mixed with sunshine and pollutants helps create unexpectedly high levels of ground-level ozone.

No. 3: Fresno-Madera, Calif.
Population: 1.1 million
Short-term particle pollution rank: 2
Year-round particle pollution rank: 6
Ozone pollution rank: 4
Cars, agriculture, petroleum and mega-dairies all contribute to the brown haze that hangs over the San Joaquin Valley.

No. 4: Visalia-Porterville, Calif.
Population: 430,000
Short-term particle pollution rank: 8
Year-round particle pollution rank: 3
Ozone pollution rank: 3
Proximity to the giant trees of Sequoia National Park isn't enough to clean Visalia's smoggy San Joaquin Valley air.

No. 5: Hanford-Corcoran, Calif.
Population: 150,000
Short-term particle pollution rank: 10
Year-round particle pollution rank: 8
Ozone pollution rank: 6
Hundreds of aircraft based at the giant Naval Air Station in nearby Lemoore doesn't help Hanford's air quality.

Click here to see the full list of America's 10 Dirtiest Cities
Response to Comment No. 12-336

Exhibit 17 is a copy of a Yahoo! Real Estate article that is referenced in Comment No. 12-127. As such, the commenter is referred to Response to Comment No. 12-127, above.

Comment No. 12-337

See next page
Chapter II — Existing Conditions, Noise Impact Issues and Noise Management History

Introduction

There are two main types of sound: ambient and intrusive. Ambient sound is the background sound that aggregates all sound emissions, far and near, as received within a particular locale. It is the "given" level of sound to which we are accustomed in our residential, work or other particular environments; the generally not unpleasant "hum" of sound about us. Intrusive sound is greater than the ambient sound level; it is perceived as "noise." It may be intermittent (siren, barking dog) or continuous (air conditioner equipment). Abatement of intrusive noise generally involves one or more of the following: reducing the noise at the source (turning down the volume), isolating the noise source by establishing buffer land uses (industrial uses around airports), blocking noise (walls, berms), or protecting the receiver (industrial ear protectors, home insulation).

The decibel (dB) is the standard unit used for measuring noise. To more closely approximate noise as it is received by the human ear at different frequencies, the decibel scale is 'A-weighted' (dBA). 'A' measures the level of sound the way sound is received by the human ear. The decibel scale is logarithmic, considered in decibels of pain to the human ear, estimating levels of 70 dBA or higher noise loss of hearing.

A comparison of types of contemporary experienced environmental noise is provided in Exhibit H. Appropriate control or abatement of noise is necessary to reduce or manage intrusive noise so as to achieve or maintain healthful ambient sound levels.

Since the adoption of the city's noise plan in 1975, significant noise management has taken place, largely due to public demand for noise abatement. Watershed legislation was the National Environmental Policy Act of 1969 (NEPA) which required all significant potential environmental impacts to be evaluated and mitigation measures determined prior to issuance of land development permits. NEPA led to the establishment of state and local environmental laws, including the 1971 California Environmental Quality Act (CEQA) and requirements that general plans contain noise elements and that cities adopt local noise ordinances. Public concerns about noise led to establishment of national transportation policies and programs, including noise standards for aircraft. NEPA and CEQA require environmental assessment and imposition of noise mitigation measures for new development projects, including transportation projects. Millions of dollars in public funds have been expended to reduce impacts of noise from existing airports and freeways, as well as for research and development of new design, noise suppression technology and regulations for mitigating noise from transportation and other sources.

Transportation systems are a primary source of urban noise. Management of noise from the most significant of these sources (aircraft, trains and freeways) generally has been preempted by federal and state authority. Primary municipal authority is regulation of land use. The City of Los Angeles has established standards for ambient noise levels that are correlated with land use zoning classifications. The standards are contained in the city's noise ordinance, Los Angeles Municipal Code (LAMC) Section 111 et seq. Compliance is achieved by a variety of means, including barriers, buffers, separation of incompatible uses and reduction of sound at its source.

The first section of this chapter discusses ordinances and other measures for regulating noise sources and mitigating noise impacts within the city. The other sections discuss the evolution of noise impacts and
Chapter III — Goals, Objectives and Policies

The following goals, objectives and policies relate to noise management within the city. The “General Plan Guidelines” issued by the Governor’s Office of Planning and Research (1990) advises that a general plan should contain goals, objectives, policies, programs and implementation monitoring. Goals are described as a general setting of direction, objectives as intermediate steps in attaining the goal, policies as specific guides to decision making and programs as specific means of achieving the policies. Each policy is to have at least one corresponding implementation measure.

The programs for the noise element are contained in the Chapter IV program implementation listing. Program numbers are referenced in this chapter after each policy with the notation ‘P’ followed by the program number.

DEFINITION OF NOISE SENSITIVE USES: For the purposes of implementation of policies and programs contained herein, the following land use categories are defined as “noise sensitive” uses: single-family dwellings, multi-unit dwellings, long-term care facilities, college convalescent and retirement facilities, dormitories, motels, hotels, transient lodgings and other residential uses; houses of worship; hospitals; test schools; auditoriums; concert halls; outdoor amusements; nature and wildlife preserves; and others.

Goal
A city where noise does not reduce the quality of urban life.

Objective 1 (Airports and Harbor)
Reduce airport and harbor related noise impacts.

Policy
1.1 Incompatibility of airports declared by Los Angeles County to be “noise problem airports” (LAX, Van Nuys and Burbank) and land uses shall be reduced to achieve zero incompatible uses within a CNEL of 65 dB airport noise exposure area, as required by the California Department of Transportation pursuant to the California Code of Regulations Title 21, Section 5000, et seq., or any amendment thereto. (P1 through P4)

Objective 2 (Nonairport)

Policy
2.2 Enforce and/or implement applicable city, state and federal regulations intended to mitigate proposed noise producing activities, reduce intrusive noise and alleviate noise that is deemed a public nuisance. (P5 through P10)

Objective 3 (Land Use Development)

Policy
3.1 Develop land use policies and programs that will reduce or eliminate potential and existing noise impacts. (P11 through P18)

Endnotes

No. Description
6 These standards are consistent with the standards proposed promulgated by the California Department of Health Services and recommended by the Governor’s Office and Planning and Research “1990 General Plan Guidelines.”
<table>
<thead>
<tr>
<th>Noise Level (dBA)</th>
<th>Common Indoor Noise Levels</th>
<th>Common Outdoor Noise Levels</th>
</tr>
</thead>
<tbody>
<tr>
<td>110</td>
<td>Rock Band</td>
<td>Jet Flyover @ 1,000 feet</td>
</tr>
<tr>
<td>100</td>
<td>Inside Subway Train</td>
<td>Gas Lawn Mower @ 3 feet</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Diesel Truck @ 50 feet</td>
</tr>
<tr>
<td>90</td>
<td>Food Blender @ 3 feet Garbage Disposal @ 3 feet</td>
<td>Noisy Urban Daytime</td>
</tr>
<tr>
<td>80</td>
<td>Shouting @ 3 feet</td>
<td>Gas Lawn Mower @ 100 feet</td>
</tr>
<tr>
<td></td>
<td>Vacuum Cleaner @ 10 feet</td>
<td>Commercial Area</td>
</tr>
<tr>
<td></td>
<td>Normal Speech @ 3 feet</td>
<td>Heavy Traffic @ 300 feet</td>
</tr>
<tr>
<td>60</td>
<td>Large Business Office</td>
<td>Quiet Urban Daytime</td>
</tr>
<tr>
<td>50</td>
<td>Dishwasher next room</td>
<td>Quiet Urban Nighttime</td>
</tr>
<tr>
<td></td>
<td>Small Theater/Conference Room (background)</td>
<td>Quiet Rural Nightime</td>
</tr>
<tr>
<td>40</td>
<td>Library</td>
<td></td>
</tr>
<tr>
<td>30</td>
<td>Bedroom at Night Concert Hall (background)</td>
<td></td>
</tr>
<tr>
<td>20</td>
<td>Broadcast &amp; Recording Studio</td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>Threshold of Hearing</td>
<td></td>
</tr>
<tr>
<td>0</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
**Exhibit I: Guidelines for Noise Compatible Land Use**

(Based on the Governor’s Office of Planning and Research, “General Plan Guidelines”, 1990. To help guide determination of appropriate land use and mitigation measures vis-a-vis existing or anticipated ambient noise levels)

<table>
<thead>
<tr>
<th>Land Use Category</th>
<th>Day-Night Average Exterior Sound Level (CNEL dB)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>50</td>
</tr>
<tr>
<td>Residential Single Family, Duplex, Mobile Home</td>
<td>A</td>
</tr>
<tr>
<td>Residential Multi-Family</td>
<td>A</td>
</tr>
<tr>
<td>Transient Lodging, Motel, Hotel</td>
<td>A</td>
</tr>
<tr>
<td>School, Library, Church, Hospital, Nursing Home</td>
<td>A</td>
</tr>
<tr>
<td>Auditorium, Concert Hall, Ampitheater</td>
<td>C</td>
</tr>
<tr>
<td>Sports Arena, Outdoor Spectator Sports</td>
<td>C</td>
</tr>
<tr>
<td>Playground, Neighborhood Park</td>
<td>A</td>
</tr>
<tr>
<td>Golf Course, Riding Stable, Water Recreation, Cemetery</td>
<td>A</td>
</tr>
<tr>
<td>Office Building, Business, Commercial, Professional</td>
<td>A</td>
</tr>
<tr>
<td>Agriculture, Industrial, Manufacturing, Utilities</td>
<td>A</td>
</tr>
</tbody>
</table>

**Legend:**

- **A** = Normally acceptable. Specified land use is satisfactory, based upon assumption buildings involved are conventional construction, without any special noise insulation.
- **C** = Conditionally acceptable. New construction or development only after a detailed analysis of noise mitigation is made and needed noise insulation features are included in project design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning normally will suffice.
- **N** = Normally unacceptable. New construction or development generally should be discouraged. A detailed analysis of noise reduction requirements must be made and noise insulation features included in the design of a project.
- **U** = Clearly unacceptable. New construction or development generally should not be undertaken.
Response to Comment No. 12-337

Exhibit 18 appears to be copies of sections of a document regarding noise that is referenced in Comment No. 12-133. As such, the commenter is referred to Response to Comment No. 12-133, above.

Comment No. 12-338

See next page
LEGEND

Public Entry
Studio Entry
Public Vehicular Circulation
Guest Vehicular Circulation
Shuttle Route
Bike Path
Pedestrian Path
Universal Shuttle Stop
Metro Red Line Plaza
Pedestrian Plaza

Note:
1. Bicycle lanes and pedestrian paths will be present on both sides of North-South Road.

Figure 74
Proposed Circulation Plan
Response to Comment No. 12-338

Exhibit 19 is a copy of Figure 74, page 906, of the Draft EIR that is referenced in Comment No. 12-63. As such, the commenter is referred to Response to Comment No. 12-63, above.

Comment No. 12-339

See next page
EXHIBIT No. 5 - UNIVERSAL CITY SPECIFIC PLAN PLANNING SUBAREAS AND HEIGHT ZONES MAP

DRAFT - October 15, 2010

Page 37 of 85
Response to Comment No. 12-339

Exhibit 20 is a copy of Exhibit No. 5, Universal City Specific Plan Planning Subareas and Height Zones Map, of the proposed Universal City Specific Plan (Appendix A-1 to the Draft EIR) that is referenced in Comment No. 12-66. As such, the commenter is referred to Response to Comment No. 12-66, above.

Comment No. 12-340

See next page
January 26, 2011

Mr. Jon Foreman
Los Angeles City Planning Department
200 S. Spring Street
Los Angeles, CA 90012

Re: NBC Universal Evolution Plan
ENV-2007-0254-EIR

Dear Mr. Foreman,

At its regular meeting on January 19, 2011, the Board of the Studio City Neighborhood Council passes the following motion:

SPECIAL-1 MOTION 2011.01.19.6: The Board of the Studio City Neighborhood Council supports the written conclusions to the NBC Universal Evolution Plan Environmental Impact Report from the Ad-Hoc Committee, appointed and overseen by the President, as the official position of the SCNC.

The report will be delivered to you no later than February 4, 2011. If you have any questions, please do not hesitate to contact us.

Sincerely yours,

John T. Walker, President
Studio City Neighborhood Council

Cc: Councilmembers Krekorian, LaBonge & Koretz, Supervisor Yaroslavsky, Michael LoGrange

JTW/Js
Response to Comment No. 12-340

Exhibit 21 is a copy of a letter from the President of the Studio City Neighborhood Council to the City Planning Department that is referenced in Comment No. 12-13. As such, the commenter is referred to Response to Comment No. 12-13, above.

Comment No. 12-341

See next page
APPENDIX
Response to Comment No. 12-341

Specific comments contained in the Appendix portion of the letter are responded to below.

Comment No. 12-342

See next page
"Los Angeles is surrounded by valleys, but there's only one Valley..."
—Hush Money, by Peter Israel

Meet Kevin at Times book festival

I always look forward to spending time with others who appreciate Valley history at the L.A. Times Festival of Books held each April at UCLA. This year, I will be signing books in the Angel City Press booth on Saturday, April 23rd from 1 p.m. to 3 p.m. Come by and say hello if you are around. If you've never been, the festival is the biggest books event in Los Angeles during the year, and it's free except for UCLA's parking charge.

Good news for America's Suburb

Recently announced it was getting out of the books business. This has led to some disruption in availability. Fortunately, America's Suburb has been picked up by the respected Angel City Press. The Santa Monica-based press has published several important books on Los Angeles history and has exciting plans for America's Suburb. The book will soon be easier to locate at bookstores and through Amazon.com. Of course the book may also be ordered directly from the Angel City website.

Praise for America's Suburb

Raves From State Librarian Kevin Starr

Dr. Kevin Starr, the honored historian and emeritus California State Librarian, lauded The San Fernando Valley: America's Suburb during a guest lecture on Valley history at California State University, Northridge.
Response to Comment No. 12-342

Appendix A consists of a screenshot of The Valley Observed website and is referenced in Comment No. 12-4. The commenter is referred to Response to Comment No. 12-4, above.

Comment No. 12-343

See next page
INTRODUCTION

The Universal City Specific Plan includes height limits, density limits, and setback regulations within the Mixed-Use and Open Space Districts to ensure that new development in the Specific Plan Area is appropriate to its surroundings. These Design Guidelines are supplemental to the regulations in the Universal City Specific Plan and provide design recommendations and flexible guidance for site planning and building design. The guidelines are not intended to be strict standards, but instead to provide adaptable direction and intention on a variety of design-related issues. In the event a particular building or site does not directly address one or more of these design guidelines, alternative means may be proposed to meet the overall intent of the guideline.

URBAN DESIGN AND PLANNING GOALS

A few key urban design concepts work together to provide a framework for all elements of future design and construction in the Specific Plan area. These concepts are reflected in both the regulatory standards of the Universal City Specific Plan, as well as in these Design Guidelines.

- Create an urban community with character derived from its unique site, sense of place, diversity of building forms, and architectural styles organized within a framework of attractive streetscapes, open spaces and public places.
- Create a pedestrian and transit oriented community providing connectivity for pedestrians, bicycles and cars, as well as access to transit.
- Create a mixed-use community that meets residents' needs for diverse housing types, retail uses, public facilities, community-serving amenities, parks and open space.
- Create a sustainable community that addresses the importance of protecting the environment.

The vision for the Mixed-Use Universal City District anticipates a broad diversity of architecture, encompassing an assortment of building forms, architectural styles, materials, colors, and design details. This vision is rooted in the diversity of the urban residential and mixed-use neighborhoods of Los Angeles. These guidelines are intended to provide principles of good design that encourage this diversity while achieving a harmonious and integrated community.

URBAN DESIGN AREAS

The plan for the Mixed-Use Universal City and Open Space Districts is organized into several distinct urban design areas:

- A Mid-rise/High-rise Town Center
- Two Mid-rise/High-rise Residential Areas
- A Low-rise Residential Area
- Three open space areas

These areas are generally defined by the blocks created by the proposed street network, within the framework of the community's open spaces. Substantial overlap in uses and building types may be expected among the Mid-rise/High-rise areas, although mid-rise and high-rise development will not occur within the Low-rise Residential Area. However, low-rise multifamily housing may be developed in any of the three urban design areas. Low-rise structures are typically two-to-six stories in height, mid-rise are between seven and nine stories, and high-rise structures are ten or more stories up to the maximum height permitted.
Response to Comment No. 12-343

Appendix B consists of a copy of a page from the proposed Universal City Specific Plan and is referenced in Comment No. 12-4. The commenter is referred to Response to Comment No. 12-4, above.

Comment No. 12-344

See next page
PHASING PROGRAM: A schedule applicable to Projects for the purpose of dividing into stages the construction of Projects and the construction of related transportation infrastructure.

P.M. PEAK HOUR: The one hour period of a weekday with the greatest average on-street traffic volume occurring during the hours of 3:00 P.M. to 7:00 P.M.

PORTABLE SIGN: A sign not permanently affixed either to land or to a structure on land.

PRELIMINARY TRAFFIC ASSESSMENT: The Department of Transportation's initial determination of the requirements for review of the Project's compliance with transportation-related Specific Plan provisions, including the necessity for a Traffic Study.

PRIOR SPECIFIC PLAN (PSP PROJECTS). Projects permitted during the period from February 16, 1991, to the effective date of this Specific Plan amending the Ventura/Cahuenga Boulevard Corridor Specific Plan.

PROJECT: Any grading, construction, erection, addition to, or structural alteration of any building or structure, a use of vacant land, or change of use on a lot located in whole or in part within the Specific Plan area, which requires the issuance of any building permit, demolition permit, excavation permit, foundation permit, grading permit, or sign permit. A Project shall not include interior construction or a change of use unless it (a) increases the floor area; or (b) increases the number of Trips; or (c) increases parking requirements pursuant to Section 7 F of this Specific Plan; or (d) includes a change of use which is not consistent with those permitted by Section 5 A 3 of this Specific Plan.

PROJECT PERMIT COMPLIANCE: An application submitted to the Director of Planning for a determination that the proposed Project meets the Specific Plan requirements and the Design Guidelines of this Specific Plan and, where applicable, that the Department of Transportation has determined in writing that the Project is in conformance with the transportation provisions of this Specific Plan.

PROJECT IMPACT ASSESSMENT FEE: The monies required to be paid into the Ventura/Cahuenga Boulevard Corridor Specific Plan Revenue Fund by an Applicant for a Project, based on the Project's floor area and land use, pursuant to the requirements of this Specific Plan.

REGIONAL COMMERCIAL PLAN DESIGNATION: A land use designation in the Community Plan which is a focal point of regional commerce, identity and activity and containing a diversity of uses, such as corporate and professional offices, residential, retail commercial malls, government buildings, major health facilities, major entertainment and cultural facilities and supporting services.
Response to Comment No. 12-344

Appendix C consists of a copy of a portion of the Ventura–Cahuenga Boulevard Corridor Specific Plan and is referenced in Comment No. 12-5. The commenter is referred to Response to Comment No. 12-5, above. The commenter is also referred to Response to Comment Nos. 12-33 and 12-165, above regarding the Ventura–Cahuenga Boulevard Corridor Specific Plan.

Comment No. 12-345

See next page
VI. Summary of Significant and Unavoidable Impacts

Impacts in three of these issue areas (traffic, air quality, and solid waste) are due in part to existing and future regional constraints that affect virtually every major project in the area. The remaining issue area (noise) is specifically related to the Project Site and the methodology that was applied to analyze this environmental issue. These conclusions also apply to the Project's No Annexation scenario.

B. Individual Environmental Issues

1. Traffic

   a. Construction

   Project impacts with regard to lane and sidewalk closures are concluded to be less than significant. However, it is conservatively concluded that significant cumulative impacts with regard to lane and temporary sidewalk closures along Lankershim Boulevard only would occur if the sidewalk closures along Lankershim Boulevard from the proposed Metro Universal project and the proposed Project occurred at the same time. This conclusion primarily results from the duration of the proposed Metro Universal project's potential impacts, as Project impacts would be limited in location, as well as being intermittent and temporary. While significant lane closure impacts have the potential to occur, the permit process utilized by the Los Angeles Department of Transportation that the Project would follow is designed to minimize this type of impact (i.e., minimize the potential for multiple lane closures due to the implementation of mitigation measures in the same area at the same time).

   b. Operations

      *(1)* Roadway Intersections

      An extensive series of project design features and mitigation measures have been identified to address the Project's significant traffic impacts. While these measures would substantially reduce the Project's intersection impacts, significant impacts would remain at the following roadway intersections:


      Intersection 23: Metro Driveway & Campo de Cahuenga Way – afternoon peak hour;
VI. Summary of Significant and Unavoidable Impacts

Intersection 29: Cahuenga Boulevard & Riverside Drive – both peak hours;
Intersection 30: Cahuenga Boulevard & Moorpark Street – both peak hours;
Intersection 33: Lankershim Boulevard & Cahuenga Boulevard – morning peak hour;
Intersection 35: Lankershim Boulevard & Main Street – afternoon peak hour;
Intersection 36: Lankershim Boulevard & Campo de Cahuenga Way/Universal Hollywood Drive – morning peak hour;
Intersection 73: Lankershim Boulevard & Jimi Hendrix Drive – afternoon peak hour; and
Intersection 82: Olive Avenue & Warner Brothers Studios Gate 2/Gate 3 – afternoon peak hour.

In addition to the specific locations identified above, it is important to note that if any of the traffic mitigation measures within the City of Los Angeles or any other jurisdiction are determined to be infeasible as discussed in Section IV.B.1, Traffic Access – Traffic/Circulation, of this Draft EIR, or necessary permits/approvals to implement the mitigation measures cannot be obtained, then a significant impact (or impacts) may remain. Furthermore, if implementation of any measure is delayed, a significant impact would also occur until the implementation of the measure.

Cumulative conditions would result in significant impacts at several intersections and the proposed Project would contribute to these impacts. Thus, the Project's contribution to impacts under future cumulative conditions would be considerable, and cumulative impacts would be significant at these intersections. While the Project's mitigation measures would reduce several of the significant impacts to a less than significant level, some of the impacts would remain significant and unavoidable.

(2) Los Angeles County Congestion Management Plan

With implementation of the project design features and mitigation measures, significant Project and cumulative impacts would remain at the following seven freeway segments:

Segment 1: Hollywood Freeway south of Alvarado Street – afternoon peak hour (southbound);
Segment 2: Hollywood Freeway south of Vermont Avenue – afternoon peak hour (southbound);
Response to Comment No. 12-345

Appendix D consists of a copy of pages 2435-2436 from the Draft EIR that are referenced in Comment No. 12-5. As such, the commenter is referred to Response to Comment No. 12-5, above.

Comment No. 12-346

See next page
VI. Summary of Significant and Unavoidable Impacts

Segment 3: Hollywood Freeway south of Santa Monica Boulevard — afternoon peak hour (southbound);

Segment 4: Hollywood Freeway south of Barham Boulevard — morning peak hour (northbound and southbound) and afternoon peak hour (southbound);

Segment 5: Hollywood Freeway north of Campo de Cahuenga Way — afternoon peak hour (northbound); and

Segment 10: SR 170 north of Magnolia Boulevard — afternoon peak hour (northbound).

(3) Neighborhood Intrusion Impacts

Proposed project design features and mitigation measures may reduce the Project’s significant neighborhood intrusion impacts to a less than significant level. However, as at this time it is not known whether consensus would be reached on the implementation of mitigation measures or if the agreed upon measures would reduce the impacts to less than significance, to be conservative, it is concluded that mitigation of the potential neighborhood intrusion impacts would not be feasible and a significant Project and cumulative traffic intrusion impact would remain.

(4) Project Access

Implementation of the identified mitigation measures would reduce impacts with regard to Project access. However, Project and cumulative impacts related to Project access would remain significant at the following two access locations:

1. Lankershim Boulevard and Campo de Cahuenga Way/Universal Hollywood Drive – both peak hours; and

2. Barham Boulevard and Lakeside Plaza Drive/Forest Lawn Drive – both peak hours.

Caltrans requested that the Project impact analysis include an evaluation of the Project’s potential effects on both on- and off-ramps, and on weaving/merging operations along those freeway segments to which the Project would add the most traffic. With the implementation of the project design features and mitigation measures, Project impacts to on- and off-ramp locations would be reduced to less than significant levels; whereas
VI. Summary of Significant and Unavoidable Impacts

weaving impacts would be reduced, but not to a less than significant level. No additional mitigation measures beyond those identified for on- and off-ramp and weaving impacts are required to address Project impacts. However, if Caltrans does not implement improvements to reduce impacts on the on- and off-ramps and freeway segments that would be affected by the Project, Project and cumulative on- and off-ramp and weaving impacts would remain significant and unavoidable. This conclusion also applies to the Project's No Annexation scenario.

2. Noise

On-site construction activities have the potential to result in significant noise impacts during daytime and nighttime hours. The implementation of the project design features and mitigation measures would reduce the daytime noise levels associated with grading and construction activities attributable to the Project; however, Project and cumulative impacts could remain significant and unavoidable. Mitigation measures proposed for nighttime construction would reduce impacts to a less than significant level, except when exterior nighttime construction as allowed by the Exceptions noted in Mitigation Measure C-2 occurs. As these limited types of nighttime construction activities would have the potential to exceed the established significance thresholds, a significant Project and cumulative impact could occur. It is important to note that while a significant impact would result under these circumstances, the likelihood that these circumstances would actually occur are limited, and when they do occur, the extent of this significant impact would be limited in duration.

3. Air Quality

a. Construction

Implementation of the mitigation measures would reduce Project construction emissions. However, regional construction impacts would remain significant and unavoidable for nitrogen oxides, carbon monoxide, volatile organic compounds, PM$_{10}$, and PM$_{2.5}$. Construction emissions would result in maximum ambient air concentrations across all construction scenarios that would exceed South Coast Air Quality Management District localized emissions thresholds, thereby resulting in significant and unavoidable impacts for nitrogen dioxide (1-hour and annual). Estimated construction emissions would also cause maximum ambient concentrations to exceed the new federal 1-hour nitrogen dioxide standard resulting in a significant impact. In addition, significant maximum ambient air concentration impacts would also occur with regard to PM$_{10}$ (24-hour and annual) and PM$_{2.5}$ (24-hour) during both Mixed-Use Residential Area 1-Phase and 3-Phase construction, as well as during concurrent construction across all Areas.
Response to Comment No. 12-346

Appendix E consists of a copy of pages 2437-2438 from the Draft EIR that are referenced in Comment No. 12-5. As such, the commenter is referred to Response to Comment No. 12-5, above.

Comment No. 12-347

See next page
The Cahuenga Pass area is a single-family hillside area that is separated from the Project Site by the Hollywood Freeway as well as the Cahuenga Boulevard area. Given the size and hillside nature of this area, existing homes range from being at the same elevation as the Project Site, for those locations closest to Cahuenga Boulevard, to homes that are approximately ¼ mile from the Project Site at elevations that are much higher than the Project Site. The proposed Project's introduction of new residences, entertainment, and commercial opportunities would complement existing surrounding areas. Given the physical separation of the entire Project Site from the Cahuenga Pass area by both distance (i.e., approximately 500 feet up to ¼ mile) and intervening structures and infrastructure (e.g., the Hollywood Freeway, as well as existing off-site buildings in the previously described Cahuenga Boulevard and Tower areas), and that Project development would reflect existing on-site development patterns, the proposed Project would not substantially and adversely change the existing land use relationships between the Project Site and the Cahuenga Pass area and would not disrupt, divide, or isolate the existing Cahuenga Pass area. Thus, the proposed Project would have a less than significant physical land use impact with respect to this area.

The Studio City area is located to the west of the Cahuenga Pass area and is also a single-family hillside area that is separated from the Project Site by the Hollywood Freeway as well as the Cahuenga Boulevard area. The Studio City area includes homes whose elevations range from roughly the same as the Project Site to those that are located at elevations that are much higher than the Project Site. From this perspective, the proposed Project would generally continue existing uses with similar building heights. Much of the southwestern area of the Project Site which is closest to Studio City is already shielded from the Studio City area by the off-site mid- and high-rise structures within the previously described Tower Area, which range from 21 to 36 stories (i.e., approximately 188 to 506 feet in height), and the Hollywood Freeway. Given the physical separation of the Project Site from the nearest development within Studio City by both distance (i.e., a minimum of approximately 600 feet to over a mile away) and intervening structures and infrastructure (e.g., the off-site mid- and high-rise structures, the Hollywood Freeway, Lankershim Boulevard, Cahuenga Boulevard and Ventura Boulevard), and that Project development would reflect existing on-site development patterns, the proposed Project would have a less than significant physical land use impact with respect to Studio City.
Response to Comment No. 12-347

Appendix F consists of a copy of page 40 from the Draft EIR that is referenced in Comment No. 12-6. As such, the commenter is referred to Response to Comment No. 12-6, above.

Comment No. 12-348

See next page
Response to Comment No. 12-348

Appendix G is a copy of a City of Los Angeles map of the Studio City Neighborhood Council area that is referenced in Comment No. 12-6. As such, the commenter is referred to Response to Comment No. 12-6, above.

Comment No. 12-349

See next page
I. Introduction/Summary

Project development within the Business Area, across Lankershim Boulevard from the Universal City Metro Red Line Station, would continue current development patterns within this portion of the Project Site. This off-site location is currently proposed for the proposed Metro Universal project, a development of approximately 1.47 million square feet of various types of new commercial and possible residential uses to be developed in two phases. As the proposed Metro Universal project site under both current and proposed conditions would consist of commercial or mixed commercial/residential uses, the proposed Project would not substantially and adversely change the existing physical land use relationship between the Project Site and the Universal City Metro Red Line Station site, nor would it disrupt, divide or isolate the existing Universal City Metro Red Line Station site. As such, the proposed Project would have a less than significant physical land use impact with respect to this location.

Development within the portion of the Project Site in proximity to the Campo de Cahuenga would be a continuation of existing land uses with building heights that are consistent with the existing mid- to high-rise office and studio structures that line the east side of Lankershim Boulevard. Future on-site buildings would be separated from the Campo de Cahuenga by the approximately 100-foot, six-lane Lankershim Boulevard roadway. As a result, the proposed Project would not substantially and adversely change the existing physical land use relationships between the Project Site and the Campo de Cahuenga and nor would Project development disrupt, divide or isolate the existing Campo de Cahuenga. Therefore, the proposed Project would have a less than significant physical land use impact with respect to this location.

Development within the portion of the Project Site that is located across Lankershim Boulevard from Weddington Park (South) would be a continuation of existing on-site uses with building heights that are consistent with the existing mid- to high-rise office and studio structures that line the east side of Lankershim Boulevard. In addition, given the physical separation between the Project Site and Weddington Park (South) by Lankershim Boulevard and the Universal City Metro Red Line Station site (i.e., a minimum distance of approximately 125 feet), and that Project development would reflect existing on- and off-site development patterns, the proposed Project would not substantially and adversely change the existing physical land use relationships between the Project Site and Weddington Park (South) and would not disrupt, divide, or isolate Weddington Park (South). Therefore, the proposed Project would have a less than significant physical land use impact with respect to this location.
The residential area located west of Lankershim Boulevard consists of the City View Lofts, a multi-family residential development located along Lankershim Boulevard, and the Island residential area consisting of single-family homes located north of Valleyheart Drive and west of the City View Lofts. Weddington Park (South) is located south of this residential area. Adverse physical land use impacts are not anticipated as Project development in this area of the Project Site would reflect existing on-site development patterns and would be separated from this area by the approximately 100-foot Lankershim Boulevard roadway. In addition, physical land use connections between the Project Site and the Island residential area are limited due to the intervening four-story City View Lofts as well as Weddington Park (South). Therefore, the proposed Project would not substantially and adversely change the existing physical land use relationships between the Project Site and this area, and would not disrupt, divide, or isolate this residential area. As such the proposed Project would have less than significant physical land use impacts with respect to this area.

(xii) Lakeside Golf Club

Future development along most of the northern Project Site boundary would be similar to existing on-site development in terms of existing land uses (studio and office) and building heights (up to approximately 75 feet). The primary increase in building heights and massing, as compared to existing conditions, would occur within the Mixed-Use Residential Area between the Los Angeles River Flood Control Channel and Lakeside Plaza Drive, where future building heights of 170 to 180 feet could provide a substantial increase above the existing four-story Lakeside Plaza structure. Nonetheless, the Los Angeles River Flood Control Channel would continue to serve to physically separate the Project Site from the Lakeside Golf Club such that, similar to existing conditions, land uses and activities within the northern portion of the Project Site under the proposed Project would not have a substantial adverse physical land use connection with the golf club. Based on this physical separation and because Project development would primarily reflect existing on- and off-site development patterns, the proposed Project would not substantially and adversely change the existing physical land use relationship between the Project Site and the Lakeside Golf Club and would not disrupt, divide, or isolate the existing Lakeside Golf Club. Therefore, the proposed Project would have a less than significant physical land use impact with respect to this private recreational facility.

(xiii) Toluca Estates Residential Area

Although the proposed Project may provide building massing greater than that of the existing homes within Toluca Estates, the Los Angeles River Flood Control Channel would continue to serve to physically separate the proposed Project Site from the southernmost homes in this residential area by a minimum distance of approximately 200 feet.
Response to Comment No. 12-349

Appendix H consists of a copy of pages 41 and 42 from the Draft EIR that are referenced in Comment No. 12-6. As such, the commenter is referred to Response to Comment No. 12-6, above.

Comment No. 12-350

See next page
II. Project Description

Site located along Barham Boulevard and Buddy Holly Drive is designated Very Low and Minimum Density Residential (RE20-1 and RE40-1 zones); (4) the southwest area of the Project Site located along the Hollywood Freeway is designated Regional Center, as well as Minimum and Medium Density Residential (C2-1, PB-1, P-1, RE15-1 and RE40-1 zones); and (5) a small portion of land along the north boundary, in the middle of the Project Site, adjacent to the Los Angeles River Flood Control Channel is designated Open Space (R1-1 zone). These Community Plan/General Plan and zoning designations are shown in Figures 7 and 8 on pages 270 and 271, respectively.

The Project Site is surrounded by a mix of commercial and residential uses, most of which are physically separated from the site by intervening facilities, such as the Los Angeles River Flood Control Channel and arterial roadways. Other movie studio and entertainment production companies are located northeast of the Project Site in Burbank's Media District, along with commercial development along Olive Avenue (which is the extension of Barham Boulevard into the City of Burbank). Properties proximal to the Project Site within the City of Burbank are designated for Media District business/commercial and multi-family medium density residential use, with single-family residential uses located north and west of the Media District. The Lakeside Golf Club, Toluca Estates and the Toluca Lake residential areas are located in proximity of the Project Site to the north, across the Los Angeles River Flood Control Channel. This area is designated for use as Low Residential (R1-1 zone), Open Space (A1-1XL zone) and Community Commercial (C2-1 zone). The Hollywood Knolls residential area is east of the Project Site, with apartment development to the northeast (across Barham Boulevard) and is designated as Medium Residential (R3-1). The Hollywood Manor residential area is located within the Hollywood Knolls area, adjacent to the Project Site, and is designated for Low Residential (R1-1 zone) use.

The Universal City Metro Red Line Station, a City park and residential development are located west of the Project Site (across Lankershim Boulevard), designated for Community Commercial (R4-1L zone, C2-1 zone), Medium Residential (R3-1) and Open Space (OS-1XL) use. Please note that the proposed Metro Universal project at the proposed NBC Universal City Metro Red Line Station site is an independent project and is not a part of the proposed NBC Universal Evolution Plan project. As such, pursuant to Section 15130 of the CEQA Guidelines, in this EIR the proposed Metro Universal project is classified as a related project and not the CEQA Guidelines, is addressed in the analysis of cumulative impact within each environmental issue included in Section IV, Environmental Impact Analysis, of this Draft EIR.
Response to Comment No. 12-350

Appendix I consists of a copy of page 269 from the Draft EIR that is referenced in Comment No. 12-8. As such, the commenter is referred to Response to Comment No. 12-8, above.

Comment No. 12-351

See next page
November 19, 2009

Mr. Jon Foreman  
City Planning Department  
200 N. Spring Street  
Los Angeles, CA 90012  

Re: Metro Universal Project ENV-2007-933-EIR  
Universal City Vision Plan (Evolution Plan) ENV-2007-0254-EIR  

Dear Mr. Foreman:

At the regular meeting on November 18, 2009, the Board of the Studio City Neighborhood Council passed the following motion:

**MOTION 2009.11.18.9b:** The Board of the Studio City Neighborhood Council respectfully requests the City Planning Department and the Los Angeles City Council combine the proposed Metro Universal Project and the Evolution Plan Environmental Impact Reports. The City Planning Department is now the lead agency for both proposed developments. There are so many impacts that the applicants term unavoidable on the surrounding communities and the EIRs are so complex that all facts and mitigations must be assessed as one development in one report. It is unfair and unreasonable to expect the communities to be able to compare these complex documents as two separate EIRs. The SCNC supports the combining of these proposed documents by the preparers.

Please inform us of your decision as soon as possible. If you have any questions, please do not hesitate to contact us.

Sincerely yours,

John T. Walker  
(acting) President  
Studio City Neighborhood Council  

Cc: Mayor Antonio Villariagosa, City Council Members, Council District 2 Neighborhood Councils, Valley Alliance of Neighborhood Councils, Southeast Valley Neighborhood Councils and Southeast Neighborhood, Property and Residents Associations  

JTW/Is
Response to Comment No. 12-351

Appendix J consists of a copy of a letter from the President of the Studio City Neighborhood Council to the City Planning Department requesting that the Metro Universal and Evolution Plan projects be combined and analyzed in one EIR and is referenced in Comment No. 12-8. As such, the commenter is referred to Response to Comment No. 12-8, above.

Comment No. 12-352

See next page
SITE PLANNING AND MASSING

This section provides recommendations concerning the overall organization of the site, including the relationship of buildings to each other and their surroundings.

Intent: Locate buildings and pedestrian circulation elements in relation to streets and open spaces to encourage pedestrian access and activity.

Guidelines:

SP1. Streets in the community should be pedestrian-oriented, with wide sidewalks, street trees, and landscaping between the sidewalk and buildings or curb, and on-street parking where appropriate.

SP1.A. Encourage walkability by providing continuous pedestrian access throughout the community.

SP1.B. Provide pedestrian pathways with appropriate amenities, including landscaping, lighting, seating areas, and view opportunities.

SP1.C. To promote better pedestrian access and to modulate the scale of development, mid-block pedestrian walkways are encouraged where consistent with the arrangement of public and private spaces.

SP2. Buildings should be oriented toward the street and encourage pedestrian activity and access. A variety of means may accomplish this, based on specific site conditions, street alignments, uses, and building types. Some of the design approaches which would support this objective include the following:

SP2.A. Across the site, buildings generally should be located proximate to the street curb, except where open spaces and plazas are intentionally used to separate buildings a greater distance from the street, or where prevented by topography and other physical conditions.

SP2.B. Within the Mid-rise/High-rise Town Center and where retail is anticipated at the ground level, buildings generally should be built to the sidewalk, except for occasional breaks for entries, public gathering spaces, outdoor dining areas, pedestrian areas, arcades, sidewalk cafes, walk-up windows, mid-block pedestrian lanes, or architectural projections.

SP2.C. Larger residential buildings may have shared entries, with prominent lobbies or central courtyards facing the street. Larger buildings may also have separate entries to individual residential units at the street level.

SP2.D. Multifamily buildings may be oriented around a courtyard with a shared pedestrian entry, or separate entries to individual residential units.

SP2.E. Multifamily buildings may include townhouses with front doors directly accessible from the street, generally separated from the sidewalk by front stoops and porches, with living areas generally elevated above sidewalk grade to provide privacy.

SP2.F. Courtyards that are open to the street and provide visual interest, orientation, and a sense of invitation are encouraged.

SP2.G. Where topography or other conditions may create additional unanticipated spaces between the building and street, these spaces should be designed to be interesting and appealing through the use of landscaping, incorporation of pedestrian amenities, and other inventive means.

Intent: Create a variety of building types to accommodate a diverse range of commercial and residential needs.

Intent: Create a skyline that is visually interesting while being sensitive to existing structures and neighboring communities, maintains views of regional landforms for existing and future residents, and maintains access to light and air.

Guidelines:

SP3. Building heights and massing should vary across the site.

SP4. The mass of tall buildings should be articulated and broken down to reduce their apparent bulk, and to enhance the verticality of their proportions.

SP5. The massing of structures should consider nearby and adjacent building forms and open spaces.

Pedestrian paths can provide opportunities for retail activities as well as for traversing significant grade changes.

Transitions in height and bulk should be used between areas of greater and lesser density. These transitions can be made by articulating individual building shapes and through connection with additional structures.
Response to Comment No. 12-352

Appendix K1 consists of a page from the proposed Universal City Design Guidelines attached to the proposed Universal City Specific Plan (Appendix A-1 to the Draft EIR) referenced in Comment No. 12-17. As such, the commenter is referred to Response to Comment No. 12-17, above.

Comment No. 12-353

See next page
Objective 1-3

To preserve and enhance the varied and distinct residential character and integrity in existing single and multi-family neighborhoods.

Policies

Program: The Plan provides the potential for a floor area ratio bonus by providing for mixed use corridors in specific commercial areas.

Objective 1-4

To promote and insure the provision of adequate housing for all persons regardless of income, age or ethnic background.

Policies

1-4.1 Promote greater individual choice in type, quality, price and location of housing.

Program: The plan promotes greater individual choice through its establishment of residential design standards and its allocation of lands for a variety of residential densities.

1-4.2 Promote housing in mixed use projects in pedestrian oriented areas and transit oriented districts.

Program: The plan provides a bonus in floor area for mixed use projects in the areas identified in this policy.

1-4.3 Ensure that new housing opportunities minimize displacement of the residents.
Response to Comment No. 12-353

Appendix K2 consists of a copy of a page from the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan referenced in Comment Nos. 12-17, 12-90, and 12-95. As such, the commenter is referred to Response to Comment Nos. 12-17, 12-90, and 12-95, above.

Comment No. 12-354

See next page
SEWER ODOR CONTROL
MASTER PLAN

OCTOBER 2006

Wastewater Engineering Services Division
Bureau of Sanitation
Department of Public Works
City of Los Angeles
EXECUTIVE SUMMARY

INTRODUCTION

The City of Los Angeles operates a wastewater collection system that consists of approximately 6,500 miles of sewers, 47 pumping plants, diversion structures, and various support facilities. This system collects sewage from 550 square miles and transports it to one of four sewage treatment plants operated by the City.

A natural phenomenon within any wastewater collection system is the production of odorous gases. Over the last decade the potential for odors venting from the sewer system has increased due to the effectiveness of the City’s industrial pretreatment program, which includes the removal of heavy metals that would otherwise precipitate dissolved sulfide from solution.

The City has been working diligently to address these odor issues and has made significant progress in controlling odors within its sewer system. Odor control measures are being implemented and new state-of-the art odor control facilities are being planned. The City has developed an odor complaint hotline, which allows for more timely responses and quick resolutions to sewer-related odor complaints. The application of odor control chemicals to sewage has reduced hydrogen sulfide concentration in treated sewers by up to 90%. The use of air scrubbers at various hot spot locations in the collection system has reduced the release of odors in known venting areas, and the construction of relief sewers has reduced the air pressure in hydraulically overloaded pipes. The on-going repair of trap maintenance holes and construction of local sewers has alleviated the migration of odors from large diameter sewers to local residences. The on-going maintenance program has decreased the potential for septic conditions to occur. These odor control measures have produced a successful odor control program in the City of Los Angeles. Sewer odors and odor complaints continue to decline steadily.

The Odor Control Master Plan evaluates the current odor control program, conducts studies in strategic areas throughout the city, identifies causes of odors, and provides recommendations for improvements. The Sewer Odor Master Plan will be updated on an annual basis to assure that odor control strategies/measures are periodically challenged, solutions remain proactive, and technologies are current and effective.

EVALUATION

The City identified and studied key areas of the sewer system based on the number of odor complaints and targeted these areas for detailed testing and analysis. Testing locations were selected based on the frequency of odor complaints as well as the physical characteristics of the collection system in the area. The physical characteristic include insufficient slope, severe slope reductions, downstream diameter reductions, major junction structures, and proximity to an inverted siphon, etc.
Four areas in the city with an unusually high number of complaints were identified as "hot spot" areas. They are:

- The Maze Area - South Los Angeles - NOS
- Sierra Bonita/West Hollywood Area VSF - LCSFVRS
- West Los Angeles/Culver City Area – WLAIS & WRS

Five additional areas were also identified as potential areas of concern and were analyzed in order to gain an accurate overview of the collection system. They are:

- Venice - Westchester Area (CIS)
- Baldwin Hills - Wilshire (WHIS/LCIS)
- Harbor Area
- West Valley
- East Los Angeles – Boyle Heights

Air pressure and hydrogen sulfide (H₂S) levels in the sewers in each area were monitored in order to qualify and quantify the odors, identify the cause of odors, and determine the optimum solutions.

RECOMMENDATIONS

For the hot spots, the recommendations are as follows:

- Recommend pressure and hydrogen sulfide level be tested on a semi-annual basis for sewers with positive pressure in the NHIS, EVRS, NOS and VORS to periodically monitor the condition of the system.

- Recommend the chemical addition at Tillman to reduce the level of hydrogen sulfide in the collection system. (IMPLEMENTED – Since the implementation, the H₂S level has been going down significantly in the EVRS).

- Recommend the construction of Radford/Woodbridge scrubber. (IMPLEMENTED – After scrubber on line, the pressure is being reduced significantly which led to the reduction in odor complaints.)

- Recommend the construction of the Glendale Burbank Interceptor Sewer (GBIS) as the long-term approach for odor control by reducing the pressure in the area. (IMPLEMENTED – The GBIS environmental process clearance is anticipated to be considered by Council in November 2006)
Response to Comment No. 12-354

Appendix L consists of a copy of an excerpt from the Sewer Odor Control Master Plan, issued by the Wastewater Engineering Services Division of the Los Angeles Department of Public Works, Bureau of Sanitation in October 2006 and referenced in Comment No. 12-19. As such, the commenter is referred to Response to Comment No. 12-19, above.

Comment No. 12-355

See next page
The County of Los Angeles Superior Court has decided that the City of Los Angeles did not properly identify and analyze all of the environmental impacts of the Glendale-Burbank Interceptor Sewer (GBIS). The court determined there was a lack of analysis in regards to settlement impacts, traffic impacts, traffic mitigation, construction noise and cumulative impacts. There, the court ordered Los Angeles to suspend the GBIS project pending adequate environmental review. The first step of decertification was taken by the Los Angeles Public Works Board on December 12, 2007.

Los Angeles Public Works Board Agenda for December 12, 2007

The final decertification of the Environmental Impact Report by the City of Los Angeles City Council is scheduled to occur on December 19, 2007. The required additional environmental analysis will occur over the next several months. However, the City of Burbank does not know whether Los Angeles will provide an opportunity for public review and comment on these documents.

Background

On November 30, 2005 the City of Los Angeles released a Draft Environmental Impact Report (EIR) to inform the public and decision makers (Los Angeles City Council) of the environmental effects of the Integrated Resources Plan (IRP). The IRP is an integrated wastewater facilities plan that describes the existing wastewater, recycled water, and runoff systems in the City of Los Angeles, identifies system inadequacies based on the needs projected for the year 2020, and provides recommended alternatives to address the future needs of the systems. The IRP would improve and upgrade the City’s wastewater and recycled water systems, and runoff management programs through the year 2020.

One of the projects discussed in the Draft EIR is a sewer tunnel project that is proposed to extend from the Los Angeles Zoo to Toluca Lake. The construction of this sewer tunnel project, known as the Glendale-Burbank Interceptor Sewer (GBIS), could have the most construction-related impacts to Burbank of any project identified in the IRP. GBIS is a part of each alternative presented in the IRP.

On November 14, 2006, the Los Angeles City Council has certified the Final Environmental Impact Report (EIR) for the Los Angeles Integrated Resources Plan (IRP). The Final EIR recommends an alignment of the Glendale-Burbank Interceptor Sewer (GBIS) which runs under Forest Lawn Drive, north under Pass Avenue, and west under Riverside Drive. It does not include any tunnel shaft sites in the City of Burbank or directly adjacent to the City property (i.e. Pollywog). The Final EIR also incorporates voluntary measures into the design of the recommended GBIS alignment including the elimination of maintenance holes within the City of Burbank and vibration and noise controls.

Below are a number of documents that are available online.

- The Petition for Writ of Mandate for Noncompliance with California Environmental Quality Act (CEQA)
  - Petition for a Writ of Mandate
- The Final EIR
  redirect.aspx?url=http%3a%2f%2fwww.lacity.org%2fsan%2firp%2findex.htm
The City of Burbank has sent a number of comment letters to the City of Los Angeles regarding this project. Those letters can be viewed by clicking on the links below:

**COMMENT LETTERS SENT**  
**DATE SENT**

<table>
<thead>
<tr>
<th>Comment Letter</th>
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<tr>
<td>Comment Letter - Hybrid Route</td>
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<td>Comment Letter - Los Angeles River Route</td>
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<td>Comment Letter - Resident Correspondence</td>
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<td>Comment Letter - Real Estate Concerns</td>
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<td>Comment Letter - Alternate Alignment Enclosure (Attachment)</td>
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**Los Angeles Draft Recommendations**

The City of Los Angeles has released their draft recommendations for the Integrated Resources Plan IRP, including the Glendale-Burbank Interceptor Sewer alignment. The draft recommendations are available at the City of Los Angeles IRP website.
Response to Comment No. 12-355

Appendix M consists of a printout from the City of Burbank website regarding the Glendale–Burbank Interceptor Sewer and is referenced in Comment No. 12-20. As such, the commenter is referred to Response to Comment No. 12-20, above.

Comment No. 12-356

See next page
Appendix I-1-1
Drainage Technical Report
The Project is proposed to be implemented via two proposed Specific Plans and various other land use entitlements. One proposed Specific Plan would address development within the County portions of the Project Site, mainly the Entertainment, Studio and Business Areas; the other proposed Specific Plan will address development within the City portions of the Project Site, mainly the Mixed-Use Residential Area.

The proposed Specific Plans would describe a range of allowable land uses and square footages, as well as applicable building envelopes providing height limitations, setbacks, and related urban design parameters. As flexibility is contemplated in the proposed Specific Plans with regard to particular uses, siting, and massing characteristics, a Conceptual Plan has been prepared as an illustrative scenario to comprehensively demonstrate a potential development program that implements the proposed Specific Plans' land use and development standards. The current Conceptual Plan for the Project is shown in Figure No. 5 on page 19. Although the Conceptual Plan provides a reasonable illustration of how the future Project Site may appear, the uses, location, and orientation of actual future buildings have not yet been determined.

The proposed development program is supported by a Circulation Plan which consists of improved access, enhanced internal circulation and convenient parking opportunities. Figure No. 6 on page 20 sets forth the Project's proposed circulation plan. In addition, the Project proposes to implement an integrated plan for landscape improvements throughout the Project Site, including a proposed Trailhead Park along the Project's Los Angeles River Flood Control Channel frontage of the Project Site.

2.0 ENVIRONMENTAL SETTING

2.1 Regional Conditions

The Project Site is located in the San Fernando Valley, a region bound by the San Gabriel Mountains to the north and the Santa Monica Mountains to the south. The Los Angeles River flows through the San Fernando Valley region. The Project Site is located on the south edge of the San Fernando Valley against the northern slopes of the Santa Monica Mountains, and south of the LAFCC/Los Angeles River.

Runoff from the Project Site drains to the LAFCC/Los Angeles River located adjacent to the Project Site. The Los Angeles River watershed covers a land area of over 834 square miles from the eastern Santa Monica Mountains to the San Gabriel Mountains to the west. A map of the Los Angeles River watershed is shown on Figure No. 7. Runoff in the northwest portion of the watershed is for a good amount of time to streams that drain southerly from north County to the

1 "Los Angeles River Watershed," County of Los Angeles, Department of Public Works; http://www.ladpw.org/wmd/watershed/la/.
Response to Comment No. 12-356

Appendix N consists of pages from Appendix I-1-1, Drainage Technical Report, to the Draft EIR and is referenced in Comment No. 12-21. As such, the commenter is referred to Response to Comment Nos. 12-21, 12-22, and 12-23, above.

Comment No. 12-357

See next page
Los Angeles Times fire map
Los Angeles fire map: Mt. Wilson, Tujunga, Acton, Altadena, Pasadena, Sierra Madre - 6:36 p.m., 9/11/09:
The Station fire is now 77% contained, fire officials said today. Crews are still working on removing vegetation on the southern and eastern edges of the blaze.
12,695 views - Public
Created on Jul 12, 2010 - Updated Jul 12, 2010
By Ron L

Oak Glen fire contained
2:34 p.m., 9/9/09: The Oak Glen Fire was 100% contained on Sept. 8 at 6:30 a.m. The blaze burned 1,159 acres, destroying one home and one outbuilding. Another home was damaged.
-- Los Angeles Times, for the latest fire news, go to LA Now.

CAL FIRE: Oak Glen Fire Incident Information

Cogswell Reservoir
4:51 p.m., 9/9/09: Unfavorable weather in the past two days prevented the backfires from occurring in the Cogswell Reservoir area—a tactic intended to prevent the spread of the flames further east. But firefighters hoped conditions would improve today to let the operation begin.

2:02 a.m., 9/7/09: Fire crews were planning to light backfires near Mt. Wilson and Cogswell Reservoir on Monday to destroy fuel.

--Los Angeles Times For the latest on the fires, head to LA Now.

Devil's Canyon / San Gabriel Wilderness burning

http://maps.google.com/maps/ms?ie=UTF8&hq=&hnear=Los+Angeles,+California&hl=en... 1/17/2011
4:50 p.m., 9/9/09: The fire continues burning into the San Gabriel Wilderness, firefighters were hoping weather conditions would improve so they can create backfires just east of the fire lines to prevent the flames' spread further east. (The icon shows the location of Devil's Canyon, which runs in a north-south direction.)
--Los Angeles Times For the latest on the fires, head to LA Now.

Mount Wilson: Safe
4:44 p.m., 9/9/09: Officials over the last two days have had to postpone planned backfires in the area from Mt. Wilson east to Cogswell Dam area because weather conditions were unfavorable. Firefighters today were hoping for calm winds and ideal temperatures so they could conduct the controlled burns.
11:40 a.m., 9/4/09: The fire continued to burn near the base of Mt. Wilson, a critical communications site in Southern California and also home to an observatory, but the area had not been overrun and that firemen were working to protect the structures.
Story: Crews wage 5-day battle to save Mt. Wilson
Story: Scientists say fire sets observatory back
--Los Angeles Times For the latest on the fires, head to LA Now.

Juniper Hills
2 a.m., 9/7/09: The eastern edge of the fire, now 51% contained, continued to burn out of control in the remote San Gabriel Wilderness. It remained a safe distance from populated areas, but fire officials remained concerned that some winds could eventually push the fire north and east into the Antelope Valley. On Sunday, as smoke drifted over Littlerock and Juniper Hills, sheriff's deputies were deployed in those communities in case an evacuation was needed. Officials continued hoping the fire would not cross Highway 39 to the east.
--Los Angeles Times For the latest on the fires, head to LA Now.

Mt. Hillyer
1:58 a.m., 9/7/09: Part of the fire's eastern edge is shaped like a horseshoe, with the open end to the northeast and with flames surrounding Mt. Hillyer. California 39, a mountain road that runs north from Azusa, is the line officials hope the fire won't cross.
--Los Angeles Times For the latest on the fires, head to LA Now.

Angeles Crest Christian Camp damage report
1:57 a.m., 9/7/09: At Angeles Crest Christian Camp, along California 2, the smoke was too thick to fully assess damage. At least three structures had burned and 26 had been saved, officials said.
-- Los Angeles Times For the latest, go to LA Now.

Hwy 39: Approximate location
1:56 a.m., 9/7/09: The eastern edge of the fire, now 51% contained, continued to burn out of control in the remote San Gabriel Wilderness. It remained a safe distance from populated areas, but fire officials remained concerned that some winds could eventually push the fire north and east into the Antelope Valley. On Sunday, as smoke drifted over Littlerock and Juniper Hills, sheriff's deputies were deployed in those communities in case an evacuation was needed. Officials continued hoping the fire would not cross Highway 39 to the east.
-- Los Angeles Times For the latest, go to LA Now.

Vetter Mountain Fire Lookout lost
9 a.m., 9/6/09: Among the structures lost in the station fire is the historic Vetter Mountain Fire Lookout, a 74-year old wood and granite structure which was the last lookout standing in the Angeles National Forest. The spot was popular with hikers. "We feel like we lost a family member," said Pam Morey, head of the Angeles Forest Fire Lookout Assn. "It's especially hard to lose something you love to arson."-- Los Angeles Times, for the latest fire news, go to LA Now.

Chantry Flat / Santa Anita Canyon safe for now
5:40 p.m., 9/9/09: Echo Mountain, Eaton Canyon, Henninger Flats, Chantry Flat, and Millard Canyon at and below the campground appeared unscathed. --Los Angeles Times For the latest on the fires, head to LA Now.
-- Los Angeles Times For the latest, head to LA Now

LAUSD's Clear Creek camp spared
12:13 a.m., 9/5/09: The Clear Creek Outdoor Educational Center, run by the LA Unified School District,
was spared, said Mark Gardina, its director. "The cabins and main buildings were spared. We have
been preparing for this for the past ten years. Each year we have increased the fire clearance in the
hopes [of] surviving this worst case scenario. We only lost some small structures and storage lockers, a
greenhouse, and a van. The fire burned within feet of every structure, but with the fuel reduction and
the firefighters, the site was saved," Gardina wrote in an e-mail to the Los Angeles Times.
-- Los Angeles Times For the latest, head to LA Now
+34° 16' 37.86", -118° 10' 15.86"

Fire caused by arson, officials say
11:43 p.m., 9/4/09: Substance found near Station fire ignition point is key evidence in arson probe

11:49 p.m., 9/3/09: A mammoth forest fire that killed two firefighters and has burned more than 147,000
acres was an act of arson, authorities said. On Wednesday, authorities cordoned off an area near Mile
Marker 29 along Angeles Crest Highway with yellow tape, blocking the highway as investigators
searched through the ash under a scorched oak tree using wire mesh sifters. The probe has been
complicated somewhat by the fact that fire burned over the point of origin twice, making the collection of
evidence difficult, other sources familiar with the investigation told The Times.
--Los Angeles Times For the latest on the fires, head to LA Now.

Northern flank largely under control
11:40 p.m., 9/4/09: The northern perimeter of the fire was "very secure."

-- Los Angeles Times For the latest, go to LA Now.

Western front under control
11:40 p.m., 9/4/09: The western edge of the fire was under control.

-- Los Angeles Times For the latest, go to LA Now.

Dillon Divide
11:36 p.m., 9/4/09: Crews today were able to close the fire line around Pacoima Canyon.

11:33 a.m, 9/4/09: Battling the flames in the Pacoima Canyon area was difficult because of brush that
reached heights of 20 feet and steep terrain where firefighters could reach out their hand and touch the
slopes they were climbing. The only current evacuations are six homes near that area along Little
Tujunga Canyon Road. Eleven homes -- roughly 25 residents -- were evacuated in the Dillon Divide
area yesterday. -- Los Angeles Times For the latest, head to LA Now.

Pacoima Canyon: Fire lines contained
11:36 p.m., 9/4/09: Crews today were able to close the fire line around Pacoima Canyon.

11:31 a.m., 9/4/09: Battling the flames in the Pacoima Canyon area was difficult because of brush that
reached heights of 20 feet and steep terrain where firefighters could reach out their hand and touch the
slopes they were climbing. The only current evacuations are six homes near that area along Little
Tujunga Canyon Road.
-- Los Angeles Times For the latest, head to LA Now.

Mendenhall Peak
11:36 p.m., 9/4/09: Crews today were able to close the fire line around Pacoima Canyon.

12:05 a.m., 9/4/09: On the western edge of the fire, crews managed to cut a series of breaks to further
protect the area around Pacoima Canyon.

1:05 p.m., 9/3/09: The fire is active around Mendenhall Peak, near where firefighters are trying to save
homes. -- Los Angeles Times For the latest, head to LA Now

Gold Creek Road
11:34 p.m., 9/4/09: Gold Creek Ranch evacuation holdouts tell their Station fire tale of survival

1:57 p.m., 9/3/09: Five people who refused to leave Gold Creek Road when the area was evacuated
made it through the Station fire. The five residents created quite a drama Monday when the fire moved
closer to their homes. After defying the evacuation order issued over the weekend, some of the
residents changed their minds and asked to be rescued. The problem is there was no way to get to
them. Later in the day, there was word the group didn’t want to be rescued.
Chilao area burned by fire
11:27 p.m., 9/4/09: Flames continue to spread in the San Gabriel Wilderness at the eastern edge. The priorities moving forward remained in the San Gabriel Wilderness and in the Chilao area.

11:40 p.m., 9/1/09: On Tuesday evening, residents in a remote enclave called Chilao were taking stock of their losses. Three of four 80-year-old homes were destroyed. For decades, Caltrans workers have lived there alongside Angeles Crest Highway, about 10 miles northeast of Mt. Wilson, and kept the road free of debris, rocks and snow for the benefit of thousands of people who travel to the top of the Angeles National Forest year round. "We were left on our own here," said equipment operator Robert Torres, whose home was the only residence spared. "At one point, there was a helicopter flying overhead with a bladder full of water and not dropping. What does that tell you?" -- Los Angeles Times

Camp Hi-Hill survives
7:55 p.m., 9/4/09: Camp Hi-Hill, the Long Beach Unified School District's outdoor science camp, has survived, despite being within the fire's perimeter, the district said yesterday. In a statement, it said that brush clearance it performed appeared to have helped save the camp. -- Los Angeles Times For the latest, go to LA Now.

Newcomb's Ranch saved
5:02 p.m., 9/4/09: Newcomb's Ranch, a popular restaurant deep in the Angeles National Forest, was saved as of this morning, according to Vicki Stevens, office manager for the nearby Angeles Crest Christian Camp.
-- Los Angeles Times For the latest, go to LA Now.

Sturtevant Camp at risk
1:18 p.m., 9/4/09: Crews were lighting backfires along the southeastern edge of the fire to prevent its spread. -- Ari Bloomekatz at the command center.

9:19 p.m., 9/2/09: The fire was pushing to the southeast in the mountains high above Sierra Madre and Monrovia as firefighters tried to save portions of Santa Anita Canyon, Chantry Flats, Devil's Canyon, Sturtevant's Camp and other areas. Officials said they were trying to push the fire to the north into the wild lands.
-- Los Angeles Times For the latest, head to LA Now.

Monrovia, Sierra Madre not in danger
12:52 a.m., 9/6/09: Crews were fending off fire on the southeastern end of the blaze and were trying to keep it from burning into Santa Anita Canyon and Chantry Flats north of Arcadia and Monrovia.
-- Los Angeles Times For the latest, go to LA Now.

Southwest flank largely under control
11:19 a.m., 9/4/09: The southwestern flank of the fire is largely under control. Containment lines have been added to the west of the fire and to the south, above Altadena.
-- Los Angeles Times For the latest, go to LA Now.

Acton and Agua Dulce appear to be safe
11:15 a.m., 9/4/09: Firefighters have controlled the blaze south of Acton, Agua Dulce. -- Los Angeles Times For the latest, go to LA Now.

Pendleton Fire 100% contained
11 a.m., 9/4/09: The Pendleton Fire was declared 100% contained at 7:15 a.m. today. The blaze burned 860 acres and destroyed one home and one outbuilding. the Cause was under investigation.
-- Los Angeles Times, for the latest fire news, go to LA Now.

Pendleton Fire Incident Information

Stony Ridge Observatory spared

http://maps.google.com/maps/ms?ie=UTF8&hq=&hnear=Los+Angeles,+California&hl=en... 1/17/2011
12:07 a.m., 9/4/09: It appeared Stony Ridge Observatory has been spared the worst.

4:30 p.m., 9/3/09: The Stony Ridge Observatory, home to a hand-built 30-inch telescope and 30-foot dome, has so far survived, but remains in danger.
-- Los Angeles Times For the latest, head to LA Now

Camp Colby: Surveying what’s lost, what’s saved

7:10 p.m., 9/3/09: Manager returns to Camp Colby to find out what is lost, and what is saved. (Location corrected.)
-- Los Angeles Times For the latest, head to LA Now

Morris fire contained

3 p.m., 9/3/09: Morris fire is 100% contained. The fire began about 4:30 p.m. Aug. 25 and burned 2,168 acres in San Gabriel Canyon near Morris Dam.

Morris Fire Incident Information

Source: GeoMAC, Aug. 29, and Inciweb.

Hidden Springs Cafe destroyed

8:56 p.m., 9/2/09: Hidden Springs Cafe, a haven for bikers, a coffee stop for commuters and a home to owner Jim Lewis and his family, has been consumed by the wildfire. -- Los Angeles Times

Big Tujunga Canyon: Residents return to see burned homes

8:36 p.m., 9/2/09: Big Tujunga Road under mandatory evacuation. Story: In Big Tujunga Canyon, fire leaves behind mourners and miracles

Angeles Crest Ranger Station

8:27 p.m., 9/2/09: Angeles Crest Ranger Station was the station closest to the ignition point of the fire.
-- Los Angeles Times For the latest, go to LA Now.

Paradise Valley celebrates

8:11 p.m., 9/2/09: La Cañada Flintridge residents express their gratitude to firefighters: The sign in the front yard of one Ocean View Boulevard home in La Cañada Flintridge said it all: "Thank you for saving Paradise Valley." The mandatory evacuation order for the neighborhood was lifted Tuesday morning.

La Crescenta, La Cañada Flintridge declared safe

12:30 a.m., 9/2/09: Mandatory evacuation order in Briggs Terrace, and all of La Crescenta and La Cañada Flintridge are lifted.
7:52 a.m., 9/1/09: In the once-threatened area of Briggs Terrace, firefighters using flares set backfires from the top of the ridge gradually down toward the homes. The burnouts neutralized the danger of the wildfire coming down. Nathan Judy of the U.S. Forest Service. "Everybody in that neighborhood has nothing to worry about," said Nathan Judy of the U.S. Forest Service. "There's no fuel to burn. We took it away."

Cottonwood fire in Hemet

10:15 p.m. 8/31/09: Cottonwood fire, which started shortly after 5 p.m. on Aug. 27, is contained. The wildfire burned 2,409 acres in the San Bernardino National Forest.
-- Los Angeles Times, for the latest fire news, go to LA Now.

Mount Gleason

9:40 p.m., 8/30/09: Two firefighters were fatally injured near Mt. Gleason Sunday afternoon. TV footage showed a truck rolled over on a mountainside.

Palos Verdes Peninsula fire

12 a.m. 8/30/09: The fire, which began about 8 p.m. on Aug. 27, was fully contained by the early afternoon of Aug. 29..
-- Los Angeles Times, for the latest fire news, go to LA Now.
Big Tujunga Ranger Station
6:50 p.m., 8/29/09: Camps between Big Tujunga Ranger Station east to Highway 2 and north to Chilao are under mandatory evacuations. -- Los Angeles Times

For the latest, head to LA Now

Switzer Falls Picnic Area
1 p.m. 8/29/09: Switzer Falls Picnic Area

Millard Campground spared
1 p.m. 8/29/09: Threatened by flames.

Mt. Waterman
11:27 p.m., 9/7/09: Winds and low humidity stoked flames on the northern front of the huge Station fire Monday, while the western flank from La Cañada Flintridge to Acton remained quiet. The 157,200-acre blaze, the largest in the recorded history of Los Angeles County, was 56% contained. Winds blowing 30 to 40 mph energized the fire in the Pleasant View Ridge area of the San Gabriel Wilderness, north of Mt. Waterman. But for the most part the charred horn of the fire area stretching from La Cañada Flintridge around the San Gabriel Mountains to the Littlerock area in the high desert was under control.

-- Los Angeles Times

For the latest, head to LA Now

Station fire perimeter

4:13 p.m, 9/9/09: Helicopters have dropped crews at the Station fire's eastern edge to try to construct a firebreak near Chileno Canyon and control the blaze's spread into the San Gabriel Wilderness. The western and northern edges of the blaze are holding, but the east and southeastern portions remain worrisome. Officials over the last two days have had to postpone planned backfires in the area from Mt. Wilson to the north and northeast and in the Cogswell Dam area because weather conditions were unfavorable. Firefighters today were hoping for calm winds and ideal temperatures so they could conduct the controlled burns. The fire still threatens 3,850 structures, though there are no evacuations. Red line shows approximate boundaries of the Station Fire taken overnight, as detected by satellite; the growth of the fire was relatively small in the past 24 hours. Source: GeoMAC

--Los Angeles Times

For the latest on the fires, head to LA Now.

Station fire perimeter

4:13 p.m, 9/9/09: Helicopters have dropped crews at the Station fire's eastern edge to try to construct a firebreak near Chileno Canyon and control the blaze's spread into the San Gabriel Wilderness. The western and northern edges of the blaze are holding, but the east and southeastern portions remain worrisome. Officials over the last two days have had to postpone planned backfires in the area from Mt. Wilson to the north and northeast and in the Cogswell Dam area because weather conditions were unfavorable. Firefighters today were hoping for calm winds and ideal temperatures so they could conduct the controlled burns. The fire still threatens 3,850 structures, though there are no evacuations. Red line shows approximate boundaries of the Station Fire taken overnight, as detected by satellite; the growth of the fire was relatively small in the past 24 hours. Source: GeoMAC

--Los Angeles Times

For the latest on the fires, head to LA Now.

Vogel Flats picnic area
5:18 p.m., 9/9/09: In Big Tujunga Canyon and the Arroyo Seco -- at popular spots such as Wildwood, Vogel Flats and Gould Mesa -- picnic tables, barbecues, restrooms, even some trees survived. But the surrounding landscape looked like a moldering wasteland.

--Los Angeles Times

For the latest on the fires, head to LA Now.

Vogel Flats picnic area
5:18 p.m., 9/9/09: In Big Tujunga Canyon and the Arroyo Seco -- at popular spots such as Wildwood, Vogel Flats and Gould Mesa -- picnic tables, barbecues, restrooms, even some trees survived. But the surrounding landscape looked like a moldering wasteland.

--Los Angeles Times

For the latest on the fires, head to LA Now.

Wildwood picnic area
5:18 p.m., 9/9/09: In Big Tujunga Canyon and the Arroyo Seco -- at popular spots such as Wildwood, Vogel Flats and Gould Mesa -- picnic tables, barbecues, restrooms, even some trees survived. But the surrounding landscape looked like a moldering wasteland.

--Los Angeles Times

For the latest on the fires, head to LA Now.

Gould Mesa campground
5:18 p.m., 9/9/09: In Big Tujunga Canyon and the Arroyo Seco -- at popular spots such as Wildwood,
Los Angeles Times fire map - Google Maps

Vogel Flats and Gould Mesa -- picnic tables, barbecues, restrooms, even some trees survived. But the surrounding landscape looked like a moldering wasteland.
--Los Angeles Times For the latest on the fires, head to LA Now.
+34° 13' 23.01", -118° 10' 42.26"

Southeastern flank
6:19 p.m., 9/9/09: Orange line indicates the rough location of the Rincon Truck Trail Road. A burnout operation was slated to occur on the Rincon Truck Trail Road on the northside of Monrovia Peak, east of Mt. Wilson. The burnout operation is intended to eliminate fuel on the ridgeline to prevent the fire from moving south toward the communities of Sierra Madre and Monrovia. But firefighters were having a difficult time with the steep terrain, and much of the work was being done inch by inch. -- Ari B. Bloomekatz
--Los Angeles Times For the latest on the fires, head to LA Now.

Fire creeping northeast
6:07 p.m, 9/9/09: Fire continues creeping toward the east and northeast. Helicopters have dropped crews at the Station fire's eastern edge to try to construct a firebreak near Chileno Canyon and control the blaze's spread into the San Gabriel Wilderness. The western and northern edges of the blaze are holding, but the east and southeastern portions remain worrisome. Since Monday, officials have had to postpone planned backfires in the area from Mt. Wilson to the north and northeast and in the Cogswell Dam area because weather conditions were unfavorable.
--Los Angeles Times For the latest on the fires, head to LA Now.

Henninger Flats campground spared
5:40 p.m., 9/9/09: Echo Mountain, Eaton Canyon, Henninger Flats, Chantry Flat, and Millard Canyon at and below the campground appeared unscathed. --Los Angeles Times For the latest on the fires, head to LA Now. +34° 11' 33.02", -118° 5' 15.25"

Eaton Canyon Park spared
5:40 p.m., 9/9/09: Echo Mountain, Eaton Canyon, Henninger Flats, Chantry Flat, and Millard Canyon at and below the campground appeared unscathed. --Los Angeles Times For the latest on the fires, head to LA Now.

Echo Mountain campground spared
5:40 p.m., 9/9/09: Echo Mountain, Eaton Canyon, Henninger Flats, Chantry Flat, and Millard Canyon at and below the campground appeared unscathed. --Los Angeles Times For the latest on the fires, head to LA Now.
+34° 12' 40.01", -118° 7' 16.26"

Mt. Lowe and upper Millard Canyon burned
5:29 p.m., 9/9/09: The west side of Mt. Lowe and upper Millard Canyon burned. Parts of the Sunset Ridge trail, from Altadena to Mt. Lowe, had already fallen into the depths of Millard Canyon, and rains this winter could further damage the trail.
--Los Angeles Times For the latest on the fires, head to LA Now.
+34° 13' 55.01", -118° 6' 21.25"

Monrovia Peak
6:16 p.m., 9/9/09: Fire officials were planning to burn areas of forestland to eliminate fuel, hoping to prevent the fire's spread to the south and east. One burnout operation was slated to happen on the Rincon Truck Trail Road on the north side of Monrovia Peak. --Ari B. Bloomekatz.
--Los Angeles Times For the latest on the fires, head to LA Now.

The eastern flank
6:25 p.m., 9/9/09: Firefighters want to remove fuel on a path alongside the fire's eastern flank, but weather conditions have hampered their efforts. The rough area of the operation is northward from Cogswell Reservoir, parallel to Chileno Canyon, toward Mt. Waterman. -- Ari B. Bloomekatz
--Los Angeles Times For the latest on the fires, head to LA Now.
Response to Comment No. 12-357

Appendix O consists of a Google map image of the project area and information provided by the *Los Angeles Times* regarding a 2009 fire and is referenced and responded to in Comment No. 12-21. As such, the commenter is referred to Response to Comment No. 12-21, above.

Comment No. 12-358

See next page
Federal disaster authorities on Friday warned that a vast swath of the Los Angeles Basin is at risk of being swamped during El Nino storm conditions unless the region’s flood control system is improved or restored.

U.S. officials Friday designated a low-lying zone, 75 square miles stretching from Pico Rivera to Long Beach, as a "special flood hazard area" in serious need of better storm runoff systems. Their findings closely match those of local experts who have mapped an 82-square-mile "inundation area" encompassing the same communities—and up to half a million people—that could be threatened by a so-called 100-year flood, a deluge so severe it only occurs, on average, once a century.

“It is critical that people know the risks facing their neighborhoods so that they can take action to protect their families and their properties,” said James Lee Witt, director of the Federal Emergency Management Agency.

The last widespread 100-year flood in the Los Angeles Basin occurred in 1938, another El Nino year. Forecasters aren’t saying that will happen again this winter, but they are saying that if it does happen, part or even most of the inundation area could be under water.

Friday’s warning came as Los Angeles County finally received permission to clear miles of choked flood control channels. Work is expected to begin at dawn today in a handful of areas around the county considered most susceptible to overflowing in the heavy rains expected this winter, a Public Works Department spokeswoman said.

In the event of a 100-year flood, the water in some places could be eight feet deep and the flood could last for several days.

A complex system of dams, debris basins, storm drains and sculpted river channels built over the last 70 years is designed to handle 100-year floods, and for the most part, it has done its job. However, overgrowth has simply reduced the amount of unpaved ground available for floodwater to flow through.

In addition, thickets of brush and trees have sprouted in many of the flood control corridors, often left to grow unchecked as environmental groups and government agencies wrangled over how best to clean out the channels.

With Friday’s granting of permission, county officials hope to clear away most of the overgrowth by Dec. 1. The sites slated for cleanup starting today include channels along the San Gabriel River near Irwindale, the Santa Clara River in Santa Clarita and the Los Angeles River in Long Beach—part of the zone newly designated as high risk by FEMA. More sites will be added next week.
The Army Corps of Engineers has spent millions of dollars shoring up the concrete-lined flood control corridors of the Los Angeles River. Those improvements will continue, chief spokesman Fred-Otto Egeler said.

Still, flood control experts like Diego Cadena, a Public Works engineer, say that if the 100-year deluge occurs this winter, the flood control system that has worked so well for so long could be overtaxed.

"If we have a major overflow on the Los Angeles River—and in the worst case, we could—that would be really bad," Cadena said.

Widespread flooding could leave as many as 117,000 structures awash in the county-designated inundation area, Public Works engineers say. Projected damage estimates run as high as $2.3 billion.

"We have a problem," is the way Public Works Deputy Director Carl Blum puts it.

This problem became evident after a particularly heavy downpour in February 1980.

A Public Works engineer patrolling the banks of the Los Angeles River found twigs, sticks and other debris atop a levee in Long Beach—clear evidence that water had come over the top. The flood control system was failing to control the flooding.

Not that any of that is news to some of the people who live along the banks of the river.

"We've got water pouring in here every time it rains a lot," said Carl Roberts, 68, who lives in an aging mobile home in the shadow of a Los Angeles River levee in Paramount.

Like most of the inundation-zone residents interviewed about the possibility of flooding in their neighborhoods this winter, Roberts had made few preparations and seemed relatively unworried.

"I'm not going to get any sandbags," he said. "They wouldn't work here anyhow. I feel kind of like the guy standing on the trapdoor with a rope around his neck. There's no point in worrying, 'cause you can't really do anything about it."

Blum said the 1980 overflow left his department with two options: Build more upstream flood control dams, or raise the levees in the places most likely to spill over the top.

"A relatively simple solution was found," he said. "We started building 4-foot-tall walls on top of the levees in the danger areas."

Of course, it wasn't actually that simple.

Congress authorized funding for its share—65%—of the project. Complaints by some environmentalists, who said the walls would be ugly and contended that the rivers should be returned to their pristine condition, were eventually resolved in court.

But the environmentalists managed to tie up state funding, and the state still hasn't agreed to pay its share of the bill.

Despite the lack of state funds, and despite delays caused by all the bickering, the construction project finally got underway two years ago.

Plans call for building 21 miles of walls along the lower reaches of the Los Angeles River and the Rio Hondo. But by next month, when rains are expected to commence, only two miles will have been completed.

"We had to start at the bottom," Cadena said. "If we'd started at the top, we'd simply have transferred the problem downstream. Unfortunately, what we've completed so far really won't have any effect if we have El Nino problems."

The average rainfall in Los Angeles during the last nine El Nino winters, beginning in 1951-52, was about 22 inches,
almost 50% higher than the overall 120-year average of 14.98 inches. The 1982-83 El Nino season—the worst in recent years—caused 14 deaths and damage estimated at $265 million.

Ants Leetmaa, director of the National Oceanographic and Atmospheric Administration, predicted a few days ago that this winter would be comparable to 1982-83. He forecast rainfall in Southern California “in the order of 200% of normal.”

The Los Angeles Basin endured a series of damaging floods during the early part of this century, and especially devastating rains during the El Nino winter of 1913-14 finally led local leaders to form the Los Angeles County Flood Control District in 1915. Bonds were sold and the construction of flood control projects began during the 1920s.

Pacoima Dam was the first, completed at the mouth of Pacoima Canyon in 1929. At 372 feet tall, it was then the second-tallest dam in the nation.

More major flood control and water conservation dams followed, built by the district and other agencies. These include Big Tujunga Dam in the Angeles National Forest north of La Canada Flintridge, Hansen Dam in Lake View Terrace, Devil's Gate Dam in Pasadena and Sepulveda Dam in Encino. A series of dams runs downstream from the West Fork headwaters of the San Gabriel River—Cogswell, San Gabriel and Morris dams in the forest above Azusa, Santa Fe Dam in Irwindale and Whittier Narrows Dam in Whittier.

The channels of the Los Angeles Basin's three principal drainage systems—the Los Angeles River, the Rio Hondo and the San Gabriel River—were cleaned out, streamlined and, in many areas, lined with concrete, often to the dismay of environmentalists and lovers of nature.

Defending the channelization, Blum—whose agency eventually absorbed the flood control district—says that the storm runoff problems in the basin are unique.

"Water flowing through our system drops 1,500 feet in 50 miles," he said. "That's as far as the Mississippi River drops in 2,300 miles. Without concrete channels, the swift-moving water here would cause severe erosion problems."

But Blum says that to do their job as designed, these channels must be kept clear of brush and trash. And because many of the channel bottoms were left unpaved to permit runoff to percolate into the ground, brush grows rapidly and trash tangles in the undergrowth.

For years, Public Works cleared the channels annually. Then, starting about a decade ago, a swarm of federal and state agencies—concerned about preserving as much of the environment as possible—began asserting jurisdiction over the channels, restricting permission to clear them out.

In some places, Public Works is permitted to clear only half the width of the channel each year. In other places, it's less than half.

A few days ago, a Public Works crew was slowly hacking a 130-foot swath down the center of the Canada de Palos Verdes storm channel, using hand tools instead of bulldozers.

"The Fish and Game people say we have to do it by hand, so we won't disturb the environment as much," Cadena said. "We've got 12 to 20 men working with chain saws and machetes, and the job will take them a month. Three or four guys with tractors could have done the whole thing in a week."

Because the crew is required to leave the stubble and roots in place, "everything probably will grow back in six months," Cadena said. "We cut a 17-foot swath upstream six months ago, and you can't even find it now."

Environmental activists Friday promised to monitor new clearance to make sure the rules are followed.

"We're not trying to stand in the way of flood control here," said Melanie Winter of the Friends of the Los Angeles River. "We're just trying to see that they do it responsibly."
The county map of the Los Angeles Basin's 100-year flood overflow zones includes a few relatively small areas beside Big Tujunga Wash in the San Fernando Valley, along the Los Angeles River on the northeast fringes of Griffith Park and in the old commercial district between the Los Angeles River and Alameda and North Main streets in downtown Los Angeles.

But most of the zones are in the low-lying areas between the San Gabriel River on the east and the Rio Hondo and Los Angeles River on the west, with some of them pushing west of the Los Angeles River into the communities of Carson, Compton and Lynwood.

Interviews with inundation zone residents showed that most of them were at least vaguely aware of the threat.

"The neighbors talk about it, but we're like everyone else," said Tony Lomelin, 69, who lives in Pico Rivera. "We won't do anything about it, and then, when it comes, we'll be drowned out."

Jack Lee, 60, who lives in Downey, had at least made some preparations. "I bought some flood insurance," Lee said. "And I'm planning to get some sandbags. One of my neighbors has a boat. We joke about getting it ready."

FEMA's Witt urged homeowners to follow Lee's example and purchase insurance now. With the federal designation of the area as high-risk, premiums are set to increase by next summer.

"Flood insurance is your first line of protection," Witt said. "We urge everyone living in flood hazard areas to take action now."

Times staff writer Dave Lesher contributed to this story.

(BEGIN TEXT OF INFOBOX / INFOGRAPHIC)

Areas at Risk

A wide swath of Los Angeles County that is home to about 500,000 residents could be flooded if El Nino rains this winter cause widespread overflows along some of the Los Angeles Basin's principal rivers and drainage channels, county and federal officials say. Shaded areas show zones that could be inundated an average of once every 100 years.

Source: Los Angeles County Department of Public Works

Related Articles
- County Builds Sand Berms to Protect Against Storms Nov 13, 1997
- Delays Create Risk of Runoff From Storms Sep 17, 1997
- The Race Is On to Fix Damage of Last Storm Before the Next Dec 14, 1997
- Preparedness Key in Wake of El Nino Warnings Aug 31, 1997

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Response to Comment No. 12-358

Appendix P consists of a 1997 *Los Angeles Times* article regarding flood risk in Los Angeles and is referenced in Comment No. 12-21. As such, the commenter is referred to Response to Comment Nos. 12-21 and 12-23, above.

**Comment No. 12-359**

See next page
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The Sheppard Mullin Real Estate and Construction Law Blog has been updated with the following article:

 AGREEMENTS CONDITIONED ON SUBSEQUENT CEQA REVIEW VIOLATE CEQA IF RECORD SHOWS AGENCY ALREADY COMMITTED TO PROJECT

In this case, the California Supreme Court invalidated agreements by the City of West Hollywood ("City") for a private senior housing project that was conditioned on satisfactory future environmental review. The court avoided establishing a bright-line rule that would define CEQA approvals as either entering into any agreement for development of a well-defined project, or the execution of unconditional agreements that irrevocably vest development rights. Instead it articulated the general principle that before conducting CEQA review, agencies must not take any action that significantly furthers a project in a manner that forecloses alternatives or mitigation measures that would ordinarily be part of CEQA review of the project. Surrounding circumstances along with the agency’s agreements should be evaluated by the courts when applying this general principle. To assist in making the determination, the court set forth a two-step approach: (i) whether the agency, in taking action indicates it will perform environmental review before making any further commitment to the project, and if so, whether the agency nevertheless limits its discretion regarding environmental review; and (ii) whether the record shows the agency committed significant resources to shape the project and forecloses consideration of meaningful alternatives.
Response to Comment No. 12-359

The comment is a reprint from the Sheppard Mullin Real Estate and Construction Law Blog summarizing a California Supreme Court decision that does not appear to be referenced in the body of the comment letter. The circumstances of the case summarized in this comment do not appear to apply to the proposed Project. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-360

See next page
**Tujunga Wash**
From Wikipedia, the free encyclopedia

**Tujunga Wash** is a stream in Los Angeles County, California. It is a tributary of the Los Angeles River, providing about a fifth of its flow, and drains about 225 square miles (580 km²). It is called a wash because it is usually dry, especially the lower reaches, only carrying significant flows during and after storms, which usually only occur between November and April.

Tujunga Wash consists of two forks, both beginning in the San Gabriel Mountains. The upper portion of Big Tujunga Wash is called Tujunga Creek, or Big Tujunga Creek. It travels roughly east and several tributaries from the north and south join it as it flows to Big Tujunga Reservoir, formed by Big Tujunga Dam. Below the dam, the stream is called Big Tujunga Wash. It continues its westward flow, enters San Fernando Valley and is met by Little Tujunga Wash a mile before reaching Hansen Reservoir, which is formed by Hansen Dam. Little Tujunga Wash comes from the north, draining the portion of the San Gabriel Mountains immediately north of Hansen Reservoir. Downstream of the dam, Tujunga Wash flows roughly south and is met halfway to its confluence with the Los Angeles River by Pacoima Wash, which drains the other side of the mountains that Little Tujunga Wash drains. Finally, Tujunga Wash meets the Los Angeles River near Studio City, California.

![Tujunga Wash looking south from Victory Boulevard](image)

Big Tujunga Dam was built by Los Angeles County and completed in 1931. Big Tujunga Reservoir can hold 5,960 acre feet (7,350,000 m³) of water. In the Los Angeles Flood of 1938 it was tested. The dam is currently undergoing a seismic retrofit, which includes doubling the thickness of the gravity arch dam. Hansen Dam was built by the United States Army Corps of Engineers and completed in 1940. Hansen Reservoir can hold 74,100 acre feet (91,000,000 m³) of water. Their primary purposes are flood control, although they also provide some groundwater recharge. Water cannot percolate in the lower portion of the watershed because it is so urbanized that there is little bare ground and streambeds have been transformed into concrete channels and the water flows too fast in the upper reaches of the watershed to sink into the ground very much. As a result, the majority of the water is discharged into the ocean.

**Crossings**

From north to south (year built in parentheses):

- Hansen Dam
- Ethel Avenue

http://en.wikipedia.org/wiki/Tujunga_Wash
See also

- Great Wall of Los Angeles

References

- Columbia Gazetteer of North America (http://www.bartleby.com/69/0/T07100.html)
- Tujunga Watershed Project (http://www.theriverproject.org/tujunga/about.html)
- California Bay-Delta Program (http://calwater.ca.gov/Programs/Watershed/WatershedGrantsBrochure_02-04/Southern_CaliforniaREGION_Awards_2003-2004.pdf) (PDF)

Retrieved from "http://en.wikipedia.org/wiki/Tujunga_Wash"
Categories: Rivers of Los Angeles County, California | Geography of the San Fernando Valley | Washes of California | Rivers of Southern California

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Response to Comment No. 12-360

Appendix Q consists of a Wikipedia page for the Tujunga Wash and is referenced in Comment No. 12-23. The commenter is referred to Response to Comment No. 12-23, above.

Comment No. 12-361

See next page
PHYSICAL CHARACTERISTICS OF THE RIVER CHANNEL

The Plan includes proposed enhancements to the existing River channel, from its origination at the confluence of Bell Creek and Arroyo Calabasas, to Washington Boulevard just south of downtown Los Angeles. There are nine distinct channel reaches that vary in geometry and width:

Reach 1: Arroyo Calabasas-Bell Creek Confluence to Sepulveda Basin
Through this largely-residential segment, the River is a concrete-lined trapezoidal channel, approximately 20 feet deep and with a bottom width of 46 to 115 feet wide. High water velocities in this reach can range from 20 to 29 feet per second, during storm events.

Reach 2: Sepulveda Basin
Sepulveda Basin is one of two segments where the River has a soft bottom and displays a more naturalized character. The River is approximately 80 feet wide and is surrounded by park area and open space. Water flows in this reach can reach approximately 15 feet per second, during storm events.

Reach 3: Taylor Yard to 1st Street
River is a concrete-lined rectangular channel, approximately 15 feet deep and with a bottom width that ranges from 60 to 160 feet. The channel right-of-way is very limited, extending only two to four feet outward from the top of the bank. Peak flow velocities range from 30 to 34 feet per second, during storm events; because of these speeds, this is one of the most challenging sections from the standpoint of restoration.

Reach 4: Tujunga Wash to Barham Boulevard

Reach 5: Barham Boulevard to Burbank Western Channel
From Barham Boulevard to the confluence of the Los Angeles River with the Burbank Western Channel, the River is a concrete-lined rectangular channel approximately 130 feet wide. Flow velocities in this reach also exceed 30 feet per second, during storm events. Riverside Drive parallels the River on the south side, while the north bank borders the City of Burbank.

Reach 6: Burbank Western Channel to Taylor Yard
From the Burbank Western Channel to Taylor Yard, the River again takes on a naturalized character, with a soft bottom. The River is very wide through this area, with flow velocities ranging from 15 to 19 feet per second, during storm events. Willows and other riparian plant species have become well established.

Reach 7: Taylor Yard
At Taylor Yard, the River has a soft bottom, and water flows are in the range of 15 to 20 feet per second, during storm events, making this area a prime candidate for significant ecosystem restoration.

Reach 8: Taylor Yard to 1st Street
The area from Taylor Yard downstream to 1st Street, with flow velocities greater than 30 feet per second, during storm events, is one of the most complex sections from a hydraulic standpoint. The channel geometry changes several times within a very short segment, and this affects the range of improvements that can be accomplished.

Reach 9: 1st Street to Washington Boulevard (Downtown)
In this final reach, the River is constrained by rail lines and freeways. The River channel is at its widest, ranging between 100 and 160 feet, has flow velocities of greater than 30 feet per second during storm events, and continues as a concrete-lined trapezoid. It is highly visible from many historic bridges and overpasses, however, and this makes it a prime location for enhancement.
Los Angeles River in front of The Verona at Valleyheart

Reach 1 - Confluence to Sepulveda Basin
The confluence of Calabasas and Bull Creeks to the Sepulveda Basin
- Near-Term: Terraces at 50-year level for treatment of side drain discharges with trees planted in contained planters, hanging vines, hard surface trail at 50-year elevation.
- Long-Term: Near-term plus buried rectangular concrete box culvert, channel widened, unlined low flow channel, extensive plantings in wide overbanks, trees planted in contained planters.
- Long Term Widening Only: Widen the River sufficiently to lower velocities so bank linings can be removed, add plantings and recreation trails.

Reach 3 - Tujunga Wash to Spreading Grounds
- Near-Term: Cantilevered partial cover on one side, steps on overbank, plants and trees in overbank, hanging vines.
- Long-Term: Near-term plus buried rectangular concrete box culvert, channel converted from rectangular to soft-bottomed trapezoidal, extensive plantings in wide overbanks, including trees.
- Long-Term Widening Only: Widen the River sufficiently to lower velocities so bank linings can be removed, add plantings and recreation trails.

Reach 4 - Cornfields-Chinatown area to 1st Street
- Near-Term: Benches at 50-year level for treatment of side drain discharges with trees planted in boxes, hanging vines, hard surface trail at 50-year elevation.
- Long-Term: Near-term plus buried rectangular concrete box culvert, channel widened, unlined low flow channel, extensive plantings in wide areas just outside of the channel wall, trees planted in contained planters.
- Long-Term Widening Only: Widen the River sufficiently to lower velocities so bank linings can be removed, add plantings and recreation trails.

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NOTES:
1. Construction costs include:
   - labor and materials, including channel demolition/construction, planting, hardscape, paving, rubber dams (10), bridge reconstruction, etc.
   - contingency percentage = 5% of initial construction costs
   - design and administration costs (also known as "soft costs") = 25%, which include engineering, design, project management, construction management, contract administration, monitoring, inspection, and permitting. The 25% is applied to initial construction costs + contingency, without land costs.

Page 1023
Response to Comment No. 12-361

Appendix Q-1 consists of pages from the Los Angeles River Revitalization Master Plan and is referenced in Comment No. 12-23. As such, the commenter is referred to Response to Comment No. 12-23, above. The commenter is also referred to Response to Comment 12-93 regarding the Los Angeles River Revitalization Master Plan. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-362

See next page
## Property Addresses

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CASE SUMMARIES

Note: Information for case summaries is retrieved from the Planning Department's Plan Case Tracking System (PCTS) database.

**Case Number:** CPC-2008-3512-GPA-ZC-HD-BL-SN-CUB-CUW-CU-ZAD-SPR
**Required Action(s):** SN-SIGN DISTRICT, BL-BUILDING LINE, CUB-CONDITIONAL USE BEVERAGE (ALCOHOL), GPA-GENERAL PLAN AMENDMENT, HD-HEIGHT DISTRICT, SPR-SITE PLAN REVIEW, ZAD-ZA DETERMINATION PER LAMC 12.27, ZC-ZONE CHANGE, CUW-CONDITIONAL USE - WIRELESS, CUW-CONDITIONAL USE - WIRELESS

**Project Descriptions(s):** GENERAL PLAN AMENDMENT, ZONE CHANGE AND HEIGHT DISTRICT CHANGE FROM [Q]C2-1-CDO, OS-1XL AND PF-1XL TO C2-2D-SN, BUILDING LINE REMOVAL INCIDENT TO A ZONE CHANGE, CONDITIONAL USE PERMITS FOR ON- AND OFF-SITE SALE OF ALCOHOL, A HOTEL, AND WIRELESS TELECOMMUNICATION FACILITIES, VESTING TENTATIVE TRACT MAP, SIGNAGE SUPPLEMENTAL USE DISTRICT, SITE PLAN REVIEW, HAUL ROUTE APPROVAL, AND AN ADJUSTMENT FOR TRANSITIONAL HEIGHT.

**Development Agreement Between the Applicant (Thomas Properties) & The City.**

**Case Number:** CPC-2007-3036-CA
**Required Action(s):** CA-CODE AMENDMENT

**Project Descriptions(s):** THE ESTABLISHMENT OF AN ORDINANCE THAT FACILITATES DEVELOPMENT WITHIN THE LA-RIO BOUNDARIES TO ENHANCE THE WATERSHED, URBAN DESIGN AND MOBILITY OF THE AREA. THESE BOUNDARIES ARE ADJACENT TO, NOT INSIDE, THE LOS ANGELES RIVER ON LAND ALREADY ZONED FOR DEVELOPMENT.

**Case Number:** CPC-1995-356-CPU
**Required Action(s):** CPU-COMMUNITY PLAN UPDATE

**Project Descriptions(s):** SHERMAN OAKS/STUDIO CITY/TOLUCA LAKE COMMUNITY PLAN UPDATE PROGRAM (CPU) - THE SHERMAN OAKS/STUDIO CITY/TOLUCA LAKE COMMUNITY PLAN IS ONE OF TEN COMMUNITY PLANS THAT ARE PART OF THE COMMUNITY PLAN UPDATE PROGRAM PHASE II (7-1-95 TO 12-31-96)

**Case Number:** CPC-1986-834-GPC
**Required Action(s):** GPC-GENERAL PLAN/ZONING CONSISTENCY (AB283)

**Project Descriptions(s):** GENERAL PLAN/ZONING CONSISTENCY - WILSHIRE, WESTLAKE, SHERMAN OAKS, STUDIO STUDIO, TOLUCA LAKE

**Case Number:** ENV-2007-933-EIR
**Required Action(s):** EIR-ENVIRONMENTAL IMPACT REPORT

**Project Descriptions(s):** THE PROPOSED TRANSIT ORIENTED DEVELOPMENT INCLUDES APPROXIMATELY 315,000 SQUARE FEET OF STUDIO PRODUCTION FACILITIES, 655,200 SQUARE FEET OF OFFICE AND A 1,130 PARKING SPACE GARAGE ON AREA A. AN 80,000 SQUARE FOOT MTA BUS TRANSFER FACILITY, 25,000 SQUARE FEET OF RETAIL AND A 1,300 SPACE PARKING GARAGE WOULD BE CONSTRUCTED ON AREA B. THE HISTORIC CAMPO DE CAHUENGA WOULD REMAIN ADJACENT TO AREA B BUT WILL NOT BE A PART OF THE PROPOSED PROJECT AND WILL NOT BE IMPACTED. AREA C INCLUDES AN APPROXIMATELY 491,400 SQUARE FOOT OFFICE BUILDING WITH A 1,675 ROOM HOTEL MAY BE CONSTRUCTED AND WILL THEREFORE NEED TO BE STUDIED IN THE EIR. THE ENTIRE PROJECT WILL BE DEVELOPED TO LEED CERTIFICATION STANDARDS AND MAY INCLUDE A COGENERATION PLANT. A ZONE CHANGE FROM C2-1-CDO TO C2-2D-SN AND BUILDING LINE REMOVAL INCIDENTAL TO A ZONE CHANGE ARE BEING REQUESTED. A CONDITIONAL USE PERMIT FOR ON-SITE AND OFF-SITE ALCOHOL SALES AND CONSUMPTION IS REQUESTED. ALSO A VESTING TENTATIVE TRACT MAP AND A HAUL ROUTE APPROVAL WILL BE NEEDED.

**Case Number:** ENV-2007-3037-MND
**Required Action(s):** MND-MITIGATED NEGATIVE DECLARATION

**Project Descriptions(s):** THE ESTABLISHMENT OF AN ORDINANCE THAT FACILITATES DEVELOPMENT WITHIN THE LA-RIO BOUNDARIES TO ENHANCE THE WATERSHED, URBAN DESIGN AND MOBILITY OF THE AREA. THESE BOUNDARIES ARE ADJACENT TO, NOT INSIDE, THE LOS ANGELES RIVER ON LAND ALREADY ZONED FOR DEVELOPMENT.

**DATA NOT AVAILABLE**

ORD-172446-SA33
ORD-164959-SA860
AFF-6100
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(*) - APN Area: LA County Assessor's Office is not the data provider for this item. The data source is from the Los Angeles County's Public Works, Flood Control, Benefit Assessment.
Address: 10660 W BLUFFSIDE DR
APN: 2423036908
PIN #: 162B177 297
Tract: TR 3434
Block: None
Lot: 2
Arb: None
Zoning: [Q]C2-1-CDO
General Plan: Regional Commercial

City of Los Angeles
Department of City Planning

Generalized Zoning

- OS
- A, RA
- RE, R5, R1, RU, RZ, RW1
- R2, RD, RMP, RW2, R3, RAS3, R4, RAS4, R5
- ADP, C1, C1.5, C2, C4, C5, CR, CW, LASED, WC
- CM, MR, CCS, M1, M2, LAX, M3, SL
- P, PB
- PF
- HILLSIDE

Page 1028
City of Los Angeles
Department of City Planning

1/5/2011
PARCEL PROFILE REPORT

PROPERTY ADDRESSES
None

ZIP CODES
None

RECENT ACTIVITY
ZI-2407 Proposed Hillside Area(Zoning), subject to hillside regulations. The eff. date is still undetermined.
ZI-2358 LA River Revitalization Master Plan

CASE NUMBERS

Address/Legal Information

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Assessor Parcel No. (APN)

| 2424043022 |

Tract

| PARTITION OF LOTS 275, 276, 277 AND 278 AND PART OF THE RIVER-BED ADJOINING IN |

Map Reference

| S C C 70672 C F 601 MAP 5227 |

Block

| None |

Lot

| FR LT E |

Arb (Lot Cut Reference)

| None |

Map Sheet

| 159B181 |
| 162B181 |

Jurisdictional Information

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Planning and Zoning Information

| Special Notes | None |
| Zoning | None |
| Zoning Information (ZI) | ZI-2358 Los Angeles River Revitalization Master Plan |
| General Plan Land Use | None |
| Plan Footnote - Site Req. | See Plan Footnotes |
| Additional Plan Footnotes | Not Available |
| Hillside Area (Zoning Code) | No |
| Specific Plan Area | None |
| Special Land Use / Zoning | None |
| Design Review Board | No |
| Historic Preservation Review | No |
| Historic Preservation Overlay Zone | None |
| Other Historic Designations | None |
| Other Historic Survey Information | None |
| Mills Act Contract | None |
| POD - Pedestrian Oriented Districts | None |
| CDO - Community Design Overlay | None |
| NSO - Neighborhood Stabilization Overlay | No |
| Streetscape | No |
| Sign District | No |
| Adaptive Reuse Incentive Area | None |
| Baseline Mansionization Ordinance | No |

The contents of this report are bound by the User Agreement as described in the Terms and Conditions of this website. For more details, please refer to the Terms & Conditions link located at http://zimas.lacity.org.
CRA - Community Redevelopment Agency
Central City Parking
Downtown Parking
Building Line
500 Ft School Zone
500 Ft Park Zone

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### Building 1
- **Year Built**: 1955
- **Building Class**: SX
- **Number of Units**: 0
- **Number of Bedrooms**: 0
- **Number of Bathrooms**: 0
- **Building Square Footage**: 4,000.0 (sq ft)

### Building 2
- **Year Built**: 1930
- **Building Class**: SX
- **Number of Units**: 0
- **Number of Bedrooms**: 0
- **Number of Bathrooms**: 0
- **Building Square Footage**: 1,631.0 (sq ft)

### Building 3
- **Year Built**: 1951
- **Building Class**: CX
- **Number of Units**: 0
- **Number of Bedrooms**: 0
- **Number of Bathrooms**: 0
- **Building Square Footage**: 182.0 (sq ft)

### Building 4
- **Year Built**: 1965
- **Building Class**: DX
- **Number of Units**: 0
- **Number of Bedrooms**: 0
- **Number of Bathrooms**: 0

### Building 5
- **Year Built**: 1948
- **Building Class**: BX
- **Number of Units**: 0
- **Number of Bedrooms**: 0
- **Number of Bathrooms**: 0
- **Building Square Footage**: 4,779.0 (sq ft)

### Additional Information
- **Airport Hazard**: None
- **Coastal Zone**: None
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- **Very High Fire Hazard Severity Zone**: No
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CASE SUMMARIES

Note: Information for case summaries is retrieved from the Planning Department's Plan Case Tracking System (PCTS) database.
Response to Comment No. 12-362

Appendix R consists of parcel profile reports for addresses in the project vicinity and is referenced in Comment No. 12-25. The commenter is referred to Response to Comment No. 12-25, above.

Comment No. 12-363

See next page
LADWP BOARD APPROVAL LETTER

TO: BOARD OF WATER AND POWER COMMISSIONERS

DATE: April 27, 2010

SUBJECT:

Surplus Water Supply Augmentation Agreement Between the Los Angeles Department of Water and Power and NBC Universal, Inc.

FOR COMMISSION OFFICE USE:

JAMES B. McDaniel
Senior Assistant General Manager - Water System

CITY COUNCIL APPROVAL REQUIRED: Yes ☑️ No ☐
CHARTER SECTION: 373

PURPOSE

Transmitted for your review and approval is a proposed Surplus Water Supply Augmentation Agreement (Agreement) for the NBC Universal, Inc.’s (NBCU) Universal City property. This Agreement was prepared in order to ensure a long-term reliable water supply for the proposed NBCU Evolution Project (Project) that requires preparation of a Water Supply Assessment.

BACKGROUND

NBCU is proposing the development of approximately 2.65 million square feet of new commercial development and 2,937 residential units.

Under the proposed Agreement, LADWP, in perpetuity, will provide annual replacement water supplies (from the City's surface water, groundwater, and imported water supplies located in the City, unincorporated portions of Los Angeles County, and the Central Basin at price to be determined by the Board of Water and Power Commissioners upon a declaration by the Los Angeles Department of Water and Power (LADWP) General Manager.

LADWP currently has pumping rights and groundwater extraction facilities in the Central Basin.
Agreement Summary

- In-City Water Supplies – Following each Water Year (defined as July 1 to June 30), NBCU will provide LADWP with leased pumping rights in the Central and/or West Coast groundwater basin to offset increased annual water deliveries. LADWP will pump the additional groundwater supplies into the water distribution system.

- County Area Water Supplies – LADWP will continue to provide surplus water supplies as we have been for decades under an existing separate agreement. Upon a declaration by the LADWP General Manager, NBCU will provide replacement water supplies per the method explained above for new County water demands.

- Recognition of Existing Water Use – LADWP recognizes that water supplies to NBCU have been provided for decades and have been incorporated into water supply planning.

- Cost – All water delivered will be billed at normal water rates.

- Capital Contributions – NBCU will reimburse LADWP for the cost of the portion of groundwater pumping facilities necessary to extract the replacement water supplies.

- Term – 50 years. Replacement water to be provided for increased water use in the City area for 30 years, and increased water to the County area as required for the entire 50-year term.

- Penalty – In the event NBCU fails to provide replacement water supplies in the required timeframe, NBCU will pay LADWP a penalty to cover LADWP’s costs for providing the water.

COST AND DURATION

Under the proposed Agreement, NBCU will provide LADWP with a capital facilities contribution for the groundwater pumping facility capacity to pump the replacement water supplies. LADWP will receive up to $1,844,508 in January 2010 dollars, to be escalated according to a construction cost index for water infrastructure. The proposed Agreement is for a 50-year term, and requires approval by both the Board of Water and Power Commissioners and the Los Angeles City Council.

FISCAL IMPACT STATEMENT

Under the proposed Agreement, NBCU will provide annual replacement for new water supplies for the proposed area of their Universal City property to be in the City. NBCU will also reimburse LADWP the cost of groundwater pumping facilities to extract the
NBC Universal, Inc. (proposed Agreement). This Water Supply Assessment is premised and contingent upon approval of the proposed Agreement with NBCU.

The replacement water supplies will be in the form of either leased pumping rights in the Central Basin acquired by NBCU and assigned to LADWP, interbasin transfer from the West Basin to the Central Basin, or alternative sources as approved by LADWP. LADWP currently has pumping rights and groundwater extraction facilities in the Central Basin.

Urban Water Management Planning

This Water Supply Assessment has been prepared in conformance with California State law to ensure that proposed projects which utilize the City’s water resources are consistent with the City’s long-term water supply availability, as detailed in the City’s most recent UWMP. The UWMP is the water supply planning document for the entire City and is prepared by the LADWP.

The UWMP identifies short- and long-term water resource management measures to meet the City’s growing water demands during normal, single-dry, and multiple-dry years. The UWMP has a 25-year planning horizon and is prepared every 5 years to reflect updated information. In the UWMP, population growth is projected along with increased water needs. The UWMP identifies anticipated new water supplies needed to meet new demand, and outlines initiatives to provide necessary water supplies, including conservation measures and other strategies. The last UWMP, approved in 2005, addresses water supply needs through 2030.

Each Water Supply Assessment performed by LADWP is carefully evaluated within the context of the 2005 UWMP and current conditions, such as restrictions on State Water Project pumping from the Sacramento-San Joaquin Delta imposed by a Federal Court. MWD, from whom the City purchases its State Water Project and Colorado River water supplies, has also been actively developing plans and making efforts to provide additional water supply reliability for the entire Southern California region. LADWP coordinates closely with MWD to ensure implementation of MWD’s water resource development plans. Part of MWD’s planning efforts is the inclusion of a “buffer” supply that is meant to protect against uncertainties in water resource supplies, such as the Federal Court’s restrictions on export pumping from the Delta.

Current Water Supply Conditions

Due to recent water supply issues, including those impacting MWD, LADWP released the Water Supply Action Plan (Plan) in May 2008. The Plan serves as a template to increase the reliability of water supply for Los Angeles and reduce dependence on imported supplies. This Plan calls for the City to develop significant additional water conservation and water recycling. To achieve the goals set forth in the Plan, LADWP is considerably expanding its recycled water system and increasing its water conservation initiatives.
The LADWP Board of Water and Power Commissioners adopted Shortage Year Rates and the Los Angeles City Council (City Council) implemented Phase III of the Water Conservation Ordinance (Ordinance), both of which became effective June 1, 2009. Shortage Year Rates and higher phases of the Ordinance are expected to remain in effect until it is determined that the water supply currently available to the City is found sufficient for normal demands.

It is LADWP staff's judgment that the City's current water shortage is due to a combination of hydrological and regulatory shortages, some of which are transitory in nature. Most of the regulatory shortages are being addressed by the five-year supply actions taken by MWD as stated above, and the hydrological shortages experienced are consistent with historical multiple-dry year water cycles accounted for in LADWP's 2005 UWMP.

The imposition of Shortage Year Rates and Phase III conservation has reduced demands consistent with what occurred in 1991, when the City first implemented water rationing and associated financial penalties for overuse. The current imposition of Shortage Year Rates and higher phases of the Ordinance produced a reduction in average customer water usage of approximately 18.7 percent for the months of June 2009 through March 2010.

Project Water Use and Conservation

Upon receiving this Water Supply Assessment request, LADWP staff had several meetings with the Project Applicant, Universal City Studios LLLP, L.P. LADWP staff recommended implementation of water conservation measures to maximize the potential water-use efficiency for the Project.

The Project Applicant has committed to implement the following conservation measures beyond those required by City municipal code:
- High-efficiency clothes washers
- Weather-based irrigation controller
- Drought tolerant plants – at least 25 percent of new landscaping areas other than production areas, entertainment attractions, and visitor entry points to Universal CityWalk and the Universal Studios Hollywood theme park.
- Cooling tower conductivity controllers or cooling tower pH conductivity controllers
- Water-saving pool filters
- Leak-detection system for swimming pools and water filled spas
- Proper hydro-zoning
- Landscaping contouring in areas other than production areas, entertainment attractions, and visitor entry points to Universal CityWalk and the Universal Studios Hollywood theme park
- Expanded use of recycled water
A written commitment of the Project's planned water conservation measures was submitted by the Project Applicant and is attached with the Water Supply Assessment in Appendix E. With the commitment to expand the use of recycled water, the total potable water demand is estimated to be 2,131.7 acre-feet per year. The existing water use at the Project's site is estimated to be 1,128.6 acre-feet per year of potable water, and 105.0 acre-feet per year of recycled water. Therefore, the total additional potable water demand for the Project is estimated to be 1,003.1 acre-feet per year.

COST AND DURATION

The Project Applicant has paid LADWP the required $10,000 fee to cover LADWP's expenses in preparing this Water Supply Assessment.

FUNDING SOURCE

Fiscal Year: 2009-2010
Functional Item No.: 305-1000
Location in Budget: Job No. 10024, Cost Element 10

FISCAL IMPACT STATEMENT

A fee of $10,000 was paid to LADWP by the Project Applicant, which is consistent with LADWP's required fee, and will be deposited into the Water Revenue Fund.

HISTORY

Pursuant to the October 4, 1955 Agreement ("The 1955 Agreement"), LADWP and Universal Pictures Company, Inc., LADWP provided surplus water to portions of the Universal City property outside of the City of Los Angeles jurisdiction, more specifically, those areas located in the County.

On May 9, 1991, the 1955 Agreement was superseded by Agreement No. 10014 between LADWP and MCA Inc. to include the use of recycled/reclaimed water for landscape irrigation purposes on the property. Under the Agreement, LADWP would continue delivery of surplus water to the County portion of the land. On June 24, 1991, Agreement No. 10014 was amended to include equal applicability of the City's water conservation ordinances to the County portion of the land.

ENVIRONMENTAL DETERMINATION

In accordance with the California Environmental Quality Act (CEQA), it has been determined that this Water Supply Assessment is exempt from further requirements pursuant to the General Exemption described in CEQA Guidelines Section 15268.
CONFLICT OF INTEREST STATEMENT

All conflict of interest procedures were followed. No conflict of interest issues were identified.

RECOMMENDATION

It is recommended that your Honorable Board adopt the attached resolution, approved as to form and legality by the City Attorney, authorizing the Water Supply Assessment for the proposed NBC Universal Evolution Plan Project.

This Water Supply Assessment is contingent upon approval of the Surplus Water Supply Augmentation Agreement between LADWP and NBC Universal, Inc. by the Los Angeles City Council.

JLH:isf
Attachments
e-clatt: Austin Beutner
   Raman Raj
   Richard M. Brown
   Aram Benyamin
   James B. McDaniel
   Cecilia K.T. Weldon
   Lorraine A. Paskett
   Jeffery L. Peltola
   Maria Sison-Roces
   Thomas M. Erb
   Jin L. Hwang
RESOLUTION NO. __________

WHEREAS, NBC Universal, Inc. (NBCU) proposes a major new development on its Universal City property that will increase water demand; and

WHEREAS, LADWP and NBCU negotiated a Surplus Water Supply Augmentation Agreement (Agreement), approved as to form and legality by the City Attorney, for NBCU to provide replacement water supplies, a copy of which is on file with the Secretary of the Board; and

WHEREAS, the Agreement requires NBCU to provide annual replacement for new water supplies to the area to be located within the City, and replacement water supplies for new water in the unincorporated area of Los Angeles County upon declaration by LADWP’s General Manager;

WHEREAS, NBCU will provide replacement water supplies in the form of groundwater pumping credits in the local Central and/or West Coast Groundwater Basins; and

WHEREAS, NBCU will pay LADWP the capital costs for the groundwater facilities required to pump the replacement water supplies; and

WHEREAS, the proposed Agreement has a term of 50 years upon approval by the Board of Water and Power Commissioners (Board) and the Los Angeles City Council.

NOW, THEREFORE, BE IT RESOLVED, that the Board approves the Agreement and recommends approval by the Los Angeles City Council of the Agreement to supply water to NBCU’s Universal City property.

BE IT FURTHER RESOLVED, that upon approval by the City Council, the General Manager, or such person as the General Manager shall designate in writing as his designee, and the Secretary, Assistant Secretary, or the Acting Secretary of the Board are hereby authorized, empowered, and directed to execute said Agreement for and on behalf of LADWP.

I HEREBY CERTIFY that the foregoing is a full, true, and correct copy of a resolution adopted by the Board of Water and Power Commissioners of the City of Los Angeles at its meeting held

APPROVED AS TO FORM AND LEGALITY
CARMEN A. TRUTAVICH, CITY ATTORNEY

SP 27 2010
S. DAVID HOFFRICH
ASSISTANT CITY ATTORNEY

Secretary
AGREEMENT NO. ______

SURPLUS WATER SUPPLY AUGMENTATION AGREEMENT FOR NBC UNIVERSAL

THIS SURPLUS WATER SUPPLY AUGMENTATION AGREEMENT (the "Agreement") is made and entered into as of the last date of execution by and between NBC UNIVERSAL, INC., a Delaware corporation ("NBCU") and the LOS ANGELES DEPARTMENT OF WATER AND POWER ("LADWP"), a municipal utility serving the City of Los Angeles ("City") (each a "Party" and collectively, the "Parties"), with reference to the following facts and intentions:

RECATALS

A. NBCU owns, through a wholly owned subsidiary, a parcel of land comprising approximately 395 acres in the eastern San Fernando Valley region of Los Angeles County (the "Universal Property"), as more particularly described in Exhibit A. As of the Effective Date, approximately 24 percent of the Universal Property parcel is located within the City and the remaining 76 percent of the Universal Property is located in the unincorporated area of the County of Los Angeles. A map generally depicting these respective areas is attached hereto as Exhibit A.

B. LADWP presently serves customers within the City and certain customers outside of the jurisdictional limits of the City, including the Universal Property.

C. The City Land is presently served by LADWP pursuant to the Charter of the City ("City Charter") and the LADWP Rules Governing Water and Electric Service ("LADWP Rules").

D. Although the County Land is outside of the jurisdictional limits of the City, the City of Los Angeles has provided water service to the County Land for almost 100 years. The County Land presently receives surplus potable water service from LADWP under the terms and conditions of that certain 1991 Agreement By and Between the Los Angeles Department of Water and Power of the City of Los Angeles and MCA Inc. Regarding Water Service (the "1991 Water Agreement"). The County Land current water use, defined in Section 1.6 as Historical County Demand, has been accounted for in the City's 2005 Urban Water Management Plan.

E. NBCU intends to develop the Project on the Universal Property. The development of the Project will occur on both City Land and County Land. In connection with the implementation of the Project, adjustments will be made to the jurisdictional boundaries of the City and County.

F. NBCU currently uses approximately 1,128.6 acre-feet per year of potable water from LADWP. Based on projections of the build-out of the Project, NBCU will use an estimated maximum 2,131.7 acre-feet per year of potable water, of which 1,003.1 acre-feet per year will be net new potable demand created by the Project.
AGREEMENT NO. ________

NBCU's maximum projected Net New City Demand and Net New County Demand is 1,003.1 acre-feet per year. Estimated current and projected potable and recycled water demands are attached as Exhibit B.

G. The Parties acknowledge that LADWP holds certain water rights with respect to the Central Basin and West Basin pursuant to judicial determinations of all groundwater rights within the Central Basin and West Basin (collectively the "Adjudicated Areas").

H. Within the Adjudicated Areas, third parties have the legal right, supported by several decades of custom and practice, to acquire water through the lease and/or purchase of water and water rights.

I. The Parties intend that water and water rights within the Adjudicated Areas that are in excess of those supplies that are presently within LADWP's ownership or control, may be acquired by NBCU and made available to LADWP pursuant to this Agreement.

J. Through the actions contemplated by NBCU under this Agreement, water from the Adjudicated Areas may be used by LADWP to ensure continued potable water service from LADWP to offset (I) Net New County Demand, and (II) Net New City Demand.

K. The Parties acknowledge that a water supply assessment ("WSA") will be prepared for the Project by LADWP pursuant to Water Code Section 10910 and Government Code Section 66473,

NOW, THEREFORE, in consideration of the above recitals and other consideration, the receipt and adequacy of which the parties hereby acknowledge, the Parties agree as follows:

ARTICLE 1

DEFINITIONS

1.1 "Central Basin" means the adjudicated groundwater basin underlying the southeastern part of the Los Angeles Coastal Plain in Los Angeles County. The Central Basin is bounded to the southwest by the Newport-Inglewood Uplift, to the southeast by the Los Angeles-Orange County Line, to the north by an irregular line that approximately follows Stocker Street, Martin Luther King Boulevard, Alameda Street, Olympic Boulevard, the boundary between the City and unincorporated East Los Angeles, and the foot of the Merced and Puente Hills. A map illustrating the Central Basin is attached hereto as Exhibit C.

1.2 "City Land" means those areas of the Universal Property located within the jurisdictional boundaries of the City as of the Effective Date.
1.3 "County Land" means those areas of the Universal Property located outside the jurisdictional boundaries of the City as of the Effective Date.

1.4 "Effective Date" means the date that this Agreement is signed by both Parties.

1.5 "Historical City Demand" means the average annual potable water demand attributable to City Land during the five Water Years immediately prior to the Effective Date of the Agreement and quantified for all purposes under this Agreement as 175.7 acre-feet per year. Historical City Demand includes the historical demand for potable water attributable to any City Land that may be detached from the City into the County after the Effective Date.

1.6 "Historical County Demand" means the average annual potable water demand attributable to County Land during the five Water Years immediately prior to the Effective Date of the Agreement and quantified for all purposes under this Agreement as 952.9 acre-feet per year. Historical County Demand includes the historical demand for potable water attributable to any County Land that may be annexed into the City into the after the Effective Date.

1.7 "LADWP Rules" means LADWP Rules Governing Water and Electric Service as amended periodically by the Board of Water and Power Commissioners.

1.8 "Net New City Demand" means the total annual demand for potable water, as quantified by LADWP each Water Year, that is attributable to Revised City Land, less the Historical City Demand. For all purposes under this Agreement, NBCU’s maximum projected Net New City Demand at full build-out is estimated at 650.4 acre-feet per year.

1.9 "Net New County Demand" means the total annual demand for potable water, as quantified by LADWP each Water Year, that is attributable to Revised County Land, less the Historical County Demand. For all purposes under this Agreement, NBCU’s maximum projected Net New County Demand at full build-out is estimated at 352.7 acre-feet per year.

1.10 "Offset Election" means an election by the General Manager of LADWP to require NBCU to deliver Surplus Water to LADWP to offset Net New County Demand as provided by Article 2. Such Offset Election shall be based on a written determination by the General Manager of LADWP that NBCU must provide Surplus Water to LADWP.

1.11 "Project" means the NBCU Evolution Project for the Universal Property, as further defined in Exhibit D.

1.12 "Purchase Quantity" means the quantity of Surplus Water that is required to offset (i) Net New City Demand and (ii) Net New County Demand.
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A payment of $1,231,180.80 shall be paid concurrent with NBCU’s initial delivery of Surplus Water to LADWP to satisfy Net New County Demand as provided by Section 2.2. This amount reflects the estimated maximum Net New County Demand at full build-out of 352.7 acre-feet per year plus Historical County Demand of 952.9 acre-feet per year, totaling 1,305.6 acre-feet at $943 (in January 1, 2010 dollars) per acre-foot, before escalation per the criteria above.

A payment of $613,327.20 shall be paid as a condition of LADWP’s release of the residential tract map for the Revised City Land for recordation. This amount reflects the estimated maximum Net New City Demand at full build-out of 650.4 acre-feet per year at $943 (in January 1, 2010 dollars) per acre-foot, before escalation per the criteria above.

2.4.1 Distribution Facilities Costs. In addition to the above capital facility contributions, NBCU acknowledges its responsibility to pay for necessary recycled and potable water distribution facilities on the Universal Property sufficient to meet the demands of the property as set forth in the letter attached hereto as Exhibit F. NBCU acknowledges that this Agreement does not define the measures, including capital costs, that may be required to distribute potable and recycled water to and through the Universal Property. These measures will be determined in accordance with customary and routine LADWP Rules for similarly situated users.

2.4.2 Recycled Water Easements. NBCU and LADWP agree to negotiate in good faith on an expedited basis to identify a mutually agreeable route for easement(s) and right(s)-of-way necessary to construct, operate, and maintain those recycled water facilities which will be owned and operated by LADWP on the Revised City Land portion of the Universal Property, agreement to which will not be unreasonably withheld.

2.4.3 Potable Water Easements. NBCU and LADWP agree to negotiate in good faith on an expedited basis to identify a mutually agreeable route for easement(s) and right(s)-of-way necessary to construct, operate, and maintain those potable water facilities which will be owned and operated by LADWP on the Revised City Land portion of the Universal Property, agreement to which will not be unreasonably withheld.

2.5 Source of Surplus Water. Except as provided in Sections 2.5.1 and 2.5.2 below, the Surplus Water shall consist of water made available from Central Basin water or water rights.

2.5.1 Interbasin Transfers. In the event that water transfers, leases, and/or exchanges from the West Basin to the Central Basin are permitted by judicially approved amendments to the basin judgments or otherwise; and LADWP has obtained all required approvals to make the proposed transfer to the Central Basin, the Surplus Water may consist of water or water rights from either the Central or West Basins, or both. If the above conditions are not met, the water or water rights must be from the Central Basin.
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1.13 "Revised City Land" means the City Land together with the annexations to the City and detachments from the City effectuated by the Project, if any.

1.14 "Revised County Land" means the County Land together with the annexations to the County and detachments from the County effectuated by the Project, if any.

1.15 "Surplus Water" means water or water rights acquired by NBCU and delivered to LADWP under the provisions of this Agreement.

1.16 "Water Year" means a unit of time beginning on July 1 of each calendar year and ending on June 30 of the next calendar year.

1.17 "West Basin" means the adjudicated groundwater basin underlying the southwestern part of the Los Angeles Coastal Plain in Los Angeles County. The West Basin is bounded on the west by Santa Monica Bay, on the north by the Ballona Escarpment, on the east by the Newport-Inglewood Uplift, and on the south by San Pedro Bay and the Palos Verdes Hills. A map illustrating the West Basin is attached as Exhibit E.

1.18 Any capitalized terms not defined in this Article 1 shall have the meanings set forth in the Recitals.

ARTICLE 2

SURPLUS WATER

2.1 Obligation to Offset Net New Demand. In accordance with the conditions and time frames set forth in this Article 2, NBCU will deliver to LADWP, at NBCU's sole cost and expense, the Purchase Quantity of Surplus Water, except as otherwise provided by this Agreement. NBCU's obligation to deliver Surplus Water for each type of demand will be incurred as follows.

2.1.1 Net New City Demand. NBCU shall initiate delivery of Surplus Water to offset Net New City Demand in the first Water Year when the demand attributable to Revised City Land increases by more than 50 acre-feet per year over the Historical City Demand of 175.7 acre-feet per year. Thereafter, NBCU shall continue to deliver Surplus Water to offset each year's Net New City Demand as provided in Section 2.2.

2.1.2 Net New County Demand. NBCU shall initiate delivery of Surplus Water to offset Net New County Demand in the first Water Year when both: (a) the demand attributable to Revised County Land increases by more than 50 acre-feet per year over the Historical County Demand of 952.9 acre-feet per year, and (b) the General Manager of LADWP makes an Offset Election. Thereafter, NBCU shall deliver Surplus Water to offset Net New County Demand in each year that the General Manager makes an Offset Election. Unless the General Manager makes an Offset Election.
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Election, NBCU shall receive customary potable water service from LADWP in a manner consistent with the City Charter and LADWP Rules, without the obligation to deliver Surplus Water.

(a) Objections to General Manager's Determination. NBCU shall have the right to object to the General Manager's Offset Election by providing to LADWP written notice of NBCU's objections within sixty (60) days following receipt by NBCU of the Offset Election supported by the written determination of the LADWP General Manager that NBCU must provide Surplus Water to LADWP. Representatives of the Parties will meet and confer at least once in a good faith effort to resolve the objection within the ninety (90)-day period following LADWP's receipt of NBCU's objection notice.

(b) Appeal. If the objection is unresolved within the ninety (90)-day period, NBCU may appeal to the Board of Water and Power Commissioners. The Board's decision shall be final and not subject to judicial review.

2.1.3 Historical County Demand. Subject to the City Charter and LADWP Rules, NBCU shall continue to receive customary potable water service from LADWP for use on Revised County Land in quantities up to the Historical County Demand on terms and conditions similar to those offered to other customers outside the boundaries of the City, and it shall not be obligated under this Agreement to deliver Surplus Water to offset its Historical County Demand.

2.2 Surplus Water Quantification and Delivery. NBCU's Purchase Quantity of Surplus Water as provided by Section 2.1 will be quantified by LADWP and delivered by NBCU in arrears as follows.

2.2.1 Quantification. No later than ninety (90) days following the end of each Water Year, LADWP shall (i) establish the Purchase Quantity and (ii) provide written notice to NBCU of its quantification of the Purchase Quantity, along with reasonable documentation to support LADWP's determination.

(a) Objections to Purchase Quantity. NBCU shall have the right to object to LADWP's determination of the Purchase Quantity by providing to LADWP written notice of NBCU's objections within sixty (60) days following receipt by NBCU from LADWP of the Purchase Quantity determination and reasonable documentation to support the determination. Representatives of the Parties will meet and confer at least once in a good faith effort to resolve the objection within the ninety (90) day period following LADWP's receipt of NBCU's objection notice.

(b) Appeal. If the objection is unresolved within the ninety (90) day period, NBCU may appeal to the Board of Water and Power Commissioners. The Board's decision shall be final and not subject to judicial review.

2.2.2 Delivery. NBCU shall deliver the Purchase Quantity of Surplus Water to LADWP at NBCU's sole cost and expense, except as otherwise provided by
Section 2.3 of this Agreement. The source of the Surplus Water shall be provided in accordance with Section 2.5. Delivery shall occur when NBCU assigns or otherwise transfers the Surplus Water to LADWP in a form reasonably satisfactory to LADWP. LADWP will take, treat, and convey the Surplus Water as any other local or imported supply source.

2.2.3 Delivered in Arrears. NBCU will have up to twenty-four (24) months from the determination of the Purchase Quantity pursuant to Section 2.2.1 to deliver the Surplus Water to LADWP as provided in this Agreement. In addition, in the event that LADWP fails to timely determine the Purchase Quantity, the period of time for NBCU to deliver the Surplus Water to LADWP will be extended by one month for any month, or part thereof, by which LADWP's quantification is delayed. Subject to the provisions of Section 2.2.4, NBCU may, subject to reasonable approval by LADWP, deliver Surplus Water in advance of LADWP's determination of the Purchase Quantity as a credit against future obligations.

2.2.4 Conditions on Delivery. NBCU will deliver Surplus Water in a manner such that LADWP will be able to beneficially use or store the water for use by LADWP. NBCU shall deliver Surplus Water sufficiently in advance of any time limits on production of the Surplus Water such that LADWP is able to legally produce the full quantity of Surplus Water made available by NBCU to LADWP. Surplus Water that is made available by NBCU in a manner that LADWP cannot reasonably put the water to beneficial use or to storage will not be credited against the Purchase Quantity. LADWP shall notify NBCU in writing within thirty (30) days following receipt of a delivery of Surplus Water from NBCU if LADWP has any objections to the delivery of the Surplus Water. Representatives of the Parties will meet and confer at least once in a good faith effort to resolve LADWP's objection within the ninety (90) day period following NBCU's receipt of LADWP's objection notice.

2.3 Costs. In addition to the capital contribution set forth in Section 2.4 below, NBCU will pay the full and complete cost of acquiring the Surplus Water and making the Surplus Water available to LADWP, including any third party approval costs assessed as a condition of approval within the Adjudicated Areas. All administrative charges and annual operations and maintenance fees attributable to the management and operation of the LADWP water system and customarily recovered through the traditional LADWP water rate, including but not limited to power, conveyance, production and treatment, will be recovered by LADWP from NBCU and its customers on the Universal Property exclusively through its generally applicable rates, fees and charges and on the same basis as other similarly situated customers of LADWP as provided in Section 4 below.

2.4 Capital Facilities Contributions. NBCU will make a contribution of $943 per acre-foot towards the capital facilities that will be used to extract, convey and take delivery of Surplus Water to meet the reasonably projected needs of NBCU. All capital contributions are denominated in January 1, 2010 dollars and shall be escalated using the Engineering News-Record Construction Cost Index for the Los Angeles Area cost index factor, as compared to the January 1, 2010 cost index factor. This contribution shall be made in two installments.
2.5.2 Alternative Sources. The Parties acknowledge that new sources of water which may be beneficially used by LADWP may become available in the future under circumstances that cannot be sufficiently predicted at the Effective Date. NBCU shall have the right to deliver Surplus Water to LADWP from an alternative water source or sources other than the Central Basin or West Basin, provided that such Surplus Water meets the following criteria: (i) the water is from a firm and reliable supply source; (ii) the water quality is such that it can be efficiently treated to satisfy all primary and secondary drinking water standards and State notification levels; (iii) the water is able to be conveniently accepted and beneficially used by LADWP; and (iv) the provision of water will not result in changes in the economic arrangement of the parties as provided by this Agreement. NBCU will be responsible for any wheeling or conveyance costs lawfully assessed by a third party to deliver the water to LADWP's system. Any alternative water source shall be subject to LADWP's reasonable consent. If NBCU identifies an alternative water source, NBCU shall submit such information to LADWP as LADWP may reasonably request with respect to the alternative water source. Provided that the alternative water source meets the criteria established by this Section 2.5.2, LADWP shall not withhold its consent to such alternative water source. In the event the Parties are unable to agree with respect to such alternative water source, representatives of the Parties will meet and confer at least once in a good faith effort to resolve LADWP's refusal to consent within the ninety (90) day period following NBCU's receipt of LADWP's refusal.

2.6 Default. In the event that NBCU is unable to deliver the Purchase Quantity to LADWP within twenty-four months following the accrual of the obligation, then NBCU shall pay to LADWP a default charge equal to the product of (a) the number of acre-feet by which the Purchase Quantity is deficient; (b) the highest cost per acre-foot paid by LADWP to the Metropolitan Water District for the specific Water Year to cover NBCU's demand, plus any regulatory penalty rates or charges whatever they may be, provided that the highest cost does not include civil or regulatory penalties for negligence, malfeasance, or misconduct by LADWP; and (c) a 20% surcharge to compensate LADWP for administrative costs associated with acquiring this additional water. For example, if NBCU's acquires Surplus Water in an amount 150 acre-feet less than the applicable Purchase Quantity and LADWP's applicable highest cost for water from the Metropolitan Water District is $1,188 per acre-foot, then NBCU would pay a default charge of (150AF x $1,188/AF x 1.20) = $213,840.

2.7 Supplemental Surplus Water. NBCU has no obligation under this Agreement to deliver Surplus Water to offset Historical County Demand. However, at its sole and complete discretion, NBCU may elect to deliver supplemental Surplus Water to offset Historical County Demand. Any delivery of supplemental Surplus Water will be made in accordance with the requirements of Sections 2.2.2, 2.2.3, 2.2.4, 2.3, and 2.5 consistent with the City Charter and LADWP Rules.
ARTICLE 3

WATER RATES

3.1 Water Rates. NBCU will pay the following water rates for delivery of Surplus Water to the Universal Property:

3.1.1 City Rates. NBCU and the customers of LADWP on the Universal Property within the boundaries of the City will pay the applicable LADWP rates for service inside the City, as adopted by City Ordinance No. 170435, as amended by Ordinance Nos. 171639, 173017, 175964, 177968, and 179802, and as may be amended in the future. In the event that LADWP further amends existing or establishes new water rates, the rates charged NBCU for City Land water service shall be the same as those for similarly situated customers.

3.1.2 County Rates. NBCU and the customers of LADWP on the Universal Property outside the boundaries of the City will pay the applicable LADWP rates for service outside the City, as adopted by City Ordinance No. 170435, and as amended by Ordinance Nos. 171639, 173017, 175964, 177968, and 179802, and as may be amended in the future.

ARTICLE 4

LADWP SERVICE COMMITMENT

4.1 City Land Potable Water Service. LADWP will provide potable water service to the Revised City Land in accordance with the City Charter, LADWP Rules for service inside the City, and the terms of this Agreement. LADWP's sole remedy for failure by NBCU to supply Surplus Water, as provided for by this Agreement, shall be to receive the Default Payment. After the expiration of the Initial Term as provided in Section 5.1, NBCU's obligation to deliver Surplus Water to meet the Net New City Demand shall terminate. Thereafter, LADWP will provide potable water service to the Revised City Land pursuant to the City of Los Angeles Charter and LADWP Rules for service inside the City.

4.2 County Land Potable Water Service. LADWP will provide potable water service to the Revised County Land pursuant to the terms of this Agreement. LADWP's service to the Revised County Land shall at all times be supplemented by NBCU's commitment to deliver Surplus Water to offset Net New County Demand as provided by this Agreement. Service of the Historical County Demand shall continue in a manner consistent with the City Charter and LADWP Rules. Upon the expiration of the Term for the Revised County Land, NBCU shall be situated as any other applicant for water service outside the jurisdictional limits of the City and the Parties shall be free to negotiate a mutually agreeable contract for service at that time.

4.3 Recycled Water Service. LADWP will provide recycled water service to the Revised City Land and Revised County Land as requested by NBCU in such
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quantities as are agreed to by LADWP and NBCU under the terms of the 1991 Water Agreement, as amended from time to time; and in accordance with NBCU commitments provided to LADWP as part of the Project's WSA.

ARTICLE 5

TERM OF AGREEMENT

5.1 Initial Term of Agreement. The Initial Term of the Agreement will be thirty (30) years from the Effective Date as applied to the Revised City Land, and fifty (50) years from the Effective Date as applied to the Revised County Land.

5.2 Supplemental Capital Facilities Contribution. NBCU's Capital Facilities Contribution, described in Section 2.4, assumes Net New City Demand, Net New County Demand, and Historical County Demand of 1,956 acre-feet per year. Unanticipated increases in future Net New City Demand and Net New County Demand, should they occur, will require the payment of Supplemental Capital Facilities Contributions (Supplemental Contributions) to compensate for increased Surplus Water pumping capacity necessary to produce the Purchase Quantity, as provided for in this Section 5.2.

5.2.1 NBCU shall pay an initial non-recurring Supplemental Contribution for an increase in the Purchase Quantity in any Water Year in which the Purchase Quantity is equal to or greater than 2,375 acre-feet per year. Upon each payment by NBCU of a Supplemental Contribution, a new baseline maximum Purchase Quantity will be established and additional non-recurring Supplemental Contributions shall be paid when the Purchase Quantity exceeds the new baseline maximum by increments of more than 100 acre-feet per year. For example, if in a future Water Year NBCU's water demands require a Purchase Quantity of 2,376 acre-feet per year, NBCU will incur an initial non-recurring Supplemental Contribution of $396,060 (420 acre-feet x $943 in January 1, 2010 dollars) and 2,376 acre-feet per year shall be the new baseline for purposes of calculating any subsequent Supplemental Contribution, which would occur when the Purchase Quantity exceeded 2,476 acre-feet. No Supplemental Contribution shall be required for any Purchase Quantity less than 2,375 acre-feet per year.

5.2.2 The Supplemental Contribution shall be paid 180 days following the end of the Water Year in which it is Incurred. This supplemental contribution shall be calculated by multiplying the amount of acre-feet per year by which NBCU's Purchase Quantity exceeds its previous baseline by $943 (denominated in January 1, 2010 dollars and escalated in accordance with Section 2.4).

5.3 County Land Early Termination. In the event NBCU is able to secure firm, uninterruptible water service to its Revised County Land from another provider, NBCU may terminate this Agreement as it applies to the Revised County Land upon one (1) years' prior written notice to LADWP.
ARTICLE 6

DEFAULTS

6.1 Defaults. In the event NBCU fails to deliver Surplus Water to LADWP in accordance with the terms of this Agreement, LADWP shall have no right under this Agreement to terminate or curtail water service. LADWP’s sole remedy shall be the right to receive the Default Payments.

ARTICLE 7

GENERAL PROVISIONS

7.1 Entitlement Process. The Parties will exercise reasonable best efforts to facilitate the preparation of the WSA for the Project, as referred to in Recital L. Nothing herein shall be deemed to be an approval of the Project.

7.2 Headings. The headings of this Agreement are for convenience only and have no force or effect in the interpretation or construction of this Agreement.

7.3 Assignment. This Agreement may be transferred in whole or in part by NBCU to (i) any entity controlled by or under the common control of NBCU, (ii) any successor entity to NBCU including without limitation any conversion of NBCU to an LLC, (iii) a purchaser of all or substantially all of the Universal Property, (iv) a purchaser of all or substantially all of the Revised City Land, (v) a purchaser of all or substantially all of the Revised City Land, (vi) a mutual water company, and/or (vii) a property owners association formed for all or substantially all of the Revised City Land or Revised County Land. All other transfers by NBCU shall require the prior written consent of LADWP, which consent shall not be unreasonably withheld. This Agreement shall be binding on and shall inure to the benefit of the Parties and their respective successors and assigns. This Agreement may not be assigned by LADWP.

7.4 Waiver. The waiver of any duty under or breach of this Agreement by any Party shall not be deemed to be a waiver of any preceding or subsequent breach, nor shall any waiver constitute a continuing waiver.

7.5 Notices. All communications related to this Agreement must be delivered in writing in person, or by facsimile, U.S. mail, by Federal Express or other similar overnight delivery service at the addresses set forth below:

To: NBC Universal, Inc.
100 Universal City Plaza
Universal City, CA 91608
Attention: West Coast Real Estate
AGREEMENT NO. __________

with a copy to: NBC Universal, Inc.
30 Rockefeller Plaza
New York, NY 10112
Attention: Law Department

To: Los Angeles Department of Water and Power
Senior Assistant General Manager – Water System
P.O. Box 111, Room 1455
Los Angeles, CA 90051

Any written communication given by mail shall be deemed delivered two (2) business days after such mailing date or one (1) business day if sent by overnight delivery service. Communications by facsimile shall be deemed delivered on the date of transmission if transmitted during regular business hours, otherwise the next business day.

7.6 Authorizations. All individuals executing this Agreement and other documents on behalf of the respective Parties certify and warrant that they have the capacity and have been duly authorized to so execute the documents on behalf of the entity so indicated. Each signatory shall indemnify the other Parties to this Agreement, and hold them harmless, from any and all damages, costs, attorneys’ fees and other expenses, if the signatory is not so authorized.

7.7 Effectiveness of this Agreement. The Parties acknowledge and agree that no term or provision of this Agreement will take effect or be binding on the Parties unless and until this Agreement has been fully signed and delivered by all of the Parties.

7.8 Advice of Counsel. In executing this Agreement, each Party acknowledges that it has consulted with and had the advice and counsel of an attorney duly admitted to practice in the State of California, and each Party further acknowledges that it has executed this Agreement after independent investigation, of its own free choice and will, and without fraud, duress, or undue influence. Each Party has investigated the facts pertaining to this Agreement to the extent such Party deems necessary, assumes the risk of mistake with respect to such facts and acknowledges that this Agreement is intended to be final and binding upon the Parties regardless of any claim of mistake. This Agreement is not subject to challenge on the grounds that any or all of the legal theories or factual assumptions used for negotiating purposes are for any reason inappropriate or inaccurate.

7.9 Sole Agreement. This Agreement constitutes the entire agreement and understanding between the Parties concerning the subject matter of this Agreement, and supersedes and replaces any and all prior or contemporaneous negotiations, offers, proposals, terms, representations, warranties, and agreements, whether written or oral, concerning the subject matter of this Agreement, except the 1991 Water Agreement as provided for in Sections 4.3. The Parties acknowledge that no other party, nor any
agent or attorney of any Party, has made any promise, representation, warranty, or other inducement of any kind or nature whatsoever, written or oral, express or implied, concerning the subject matter of this Agreement, to induce the Party to execute this Agreement or for any other purpose, and each Party acknowledges that it has not executed this Agreement in reliance on any promise, representation, warranty or other inducement that is not expressly set forth in this Agreement.

7.10 **Governing Law.** This Agreement is made and entered into in the State of California and the Parties agree that this Agreement will in all respects be interpreted, enforced and governed by and under the internal laws of the State of California, without resort to choice of law principles.

7.11 **Construction/Severability.** The Agreement shall be construed without regard to any presumption or rule requiring construction against the party causing such instrument to be drafted, as each Party has participated in negotiating the drafting of this Agreement and had the opportunity to have their counsel review it. The language in all parts of this Agreement will, in all cases, be liberally construed to effect its purposes, and as a whole according to its meaning and not strictly for or against any Party. Should any provision of this Agreement be declared or determined by any court to be illegal or invalid, the validity of the remaining parts, terms or provisions will not be affected thereby and such illegal or invalid part, term or provision will not be deemed to be a part of this Agreement, unless such severance frustrates the fundamental purpose and intent of this Agreement.

7.12 **Execution of Agreement.** This Agreement may be executed in counterparts with the same force and effect as if executed in one complete, original document. Signatures delivered by facsimile or electronic transmission will be accepted as though originals.

7.13 **Third Party Beneficiaries, Obligors and Parties.** This Agreement is binding upon and inures to the benefit of each of the Parties, and their respective successors and assigns. The only parties to this Agreement are those specifically named in this Agreement who have signed the Agreement in their own name. There are no third party beneficiaries or obligors to this Agreement. This Agreement is not enforceable by any person not a Party to this Agreement, or their respective representatives, heirs, devisees, successors and assigns.

7.14 **Obligation to Proceed With Project.** Nothing in this Agreement requires NBCU to proceed with the Project, and the Parties recognize that the timing of implementing the Project is exclusively within the discretion of NBCU and that the implementation of the Project may not occur.

7.15 **Remedies.** Except as otherwise provided by Section 6, the Parties shall have all rights and remedies in law and in equity

7.16 **Relationship of the Parties.** The Parties hereby renounce the existence of any joint venture or partnership among them and agree that nothing contained in this
Agreement may be construed as making the Parties joint venturers or partners of any other Party to this Agreement.

7.17 Amendment to Agreement. Any amendment to this Agreement must be in writing and signed by duly authorized representatives of the Parties hereto and state the intent of the Parties to amend this Agreement.

7.18 Further Assurances. The Parties agree that each of them will execute and deliver to the other Parties all such further documents and instruments as may be necessary and appropriate to effect the terms and conditions of this Agreement.

7.19 Time of the Essence. Time is of the essence of this Agreement and the performance by each Party of the obligations on that Party's part to be performed.

IN WITNESS WHEREOF, the Parties have executed this Agreement as of the date last written below.

DEPARTMENT OF WATER AND POWER
OF THE CITY OF LOS ANGELES BY
BOARD OF WATER AND POWER COMMISSIONERS OF
THE CITY OF LOS ANGELES

Date: By: __________________________
       Austin Beutner
       General Manager

And: __________________________
     Secretary
IN WITNESS WHEREOF, the Parties have executed this Agreement as of the date last written below.

NBC Universal Inc.

Date: ___________ By: _____________________________

Date: ___________ And: _____________________________

APR 27 2010

S. DAVID HOTCHIUS
ASSISTANT CITY ATTORNEY
NBC-Universal Water Demand Projections

<table>
<thead>
<tr>
<th></th>
<th>Current Use</th>
<th>Project Build-Out</th>
<th>Difference</th>
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<td><strong>In-City</strong></td>
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<tr>
<td>Potable</td>
<td>175.7</td>
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<td><strong>County</strong></td>
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<td><strong>Total</strong></td>
<td>1,233.6</td>
<td>2,482.7</td>
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</tr>
</tbody>
</table>

All units in acre-feet per year

Ref: e-mail Incedon Consulting Group 2-2-2010
EX. D
DEPARTMENT OF
CITY PLANNING
200 N. Spring Street, Room 525
Los Angeles, CA 90012-4801
AND
6282 Van Nuys Blvd., Suite 351
Van Nuys, CA 91401
CITY PLANNING COMMISSION
WILLIAM ROSCICHEN
PRESIDENT
REGINA M. FREER
VICE-PRESIDENT
SEAN O. BURTON
DIEGO CARDOSO
ERIC HOLOMAN
FR. SPENCER T. KEZOS
YOANDA GHEDO
BARBARA ROMERO
MICHAEL K. WOO
JAMES WILLIAMS
COMMISSION EXECUTIVE ASSISTANT
(213) 978-1300

EXECUTIVE OFFICES
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(213) 978-1274
JANE BLUMENFELD
ASSISTANT DIRECTOR
(213) 978-1272
EVA YUAN-MCDANIEL
ASSISTANT DIRECTOR
(213) 978-1273
FAX: (213) 978-1275
INFORMATION
www.planning.lacity.org

January 29, 2010

Mr. James B. McDaniel, Chief Operating Officer—Water System
Department of Water and Power
111 North Hope Street
Los Angeles, CA 90012

RE: UPDATED REQUEST FOR WATER SUPPLY ASSESSMENT FOR NBC UNIVERSAL EVOLUTION PLAN (ENV-2007-254-EIR)

Dear Mr. McDaniel:

On December 20, 2007, the Department of City Planning, acting as the CEQA Lead Agency for the project, requested that your Department prepare a water supply assessment pursuant to SB 610 for the proposed Universal City Vision Plan project. The Universal City Vision Plan project is now referred to as the NBC Universal Evolution Plan. As there have been some changes in the nomenclature and information for the proposed project, the Department of City Planning is providing an updated project description set forth below and restating its request that your Department prepare a water supply assessment for the proposed project. The Department of City Planning is currently preparing a Draft Environmental Impact Report (EIR) for the proposed project and we need to include the water supply assessment in the Draft EIR. We have included for your use a copy of the vicinity map and radius map.

Project Name: NBC Universal Evolution Plan

Project Address: 100 Universal City Plaza, Universal City, CA 91608 (Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan Area)

Project Description: The Project Applicant, Universal City Studios LLP, L.P., proposes the development of approximately 2.01 million net new square feet of various commercial uses (approximately 2.65 million square feet of new commercial development less approximately 638,000 square feet of demolition) and 2,937 residential units (the “Project”). The Project proposes new development across all of the major types of land uses that occur on, and adjacent to, the Project site, including entertainment (including amphitheater use), retail, studio, studio office, office, hotel and child care uses, in addition to the introduction of residential uses to the Project site. This proposed new development would be supported by additional parking facilities.
and improvements to the on-site circulation system. The Project site is divided into the following four areas: (1) Studio, (2) Entertainment, (3) Business, and (4) Mixed-Use Residential. The Project site is located within both the City of Los Angeles and County of Los Angeles jurisdictional boundaries. The areas of the Project site that are located within unincorporated Los Angeles County receive water service from the Los Angeles Department of Water and Power (LADWP). As a result, water service to the entire Project site is provided by the LADWP.

The Project Applicant is requesting the following discretionary approvals from the City of Los Angeles as part of the proposed Project: adoption of a Specific Plan to regulate development within the City portions of the Project site; General Plan Amendments to establish a Specific Plan land use designation for the City portions of the Project site and to delete a small portion of the Project site (approximately 1.5 acres) that is located within the boundaries of the Mulholland Scenic Parkway Specific Plan; Zone Change and zone text amendment to effectuate the new Specific Plan; Tentative Tract Maps for mixed-use development; Development and Pre-Annexation Agreement; haul route permit; protected tree removal and grading approvals; and any additional actions that may be determined necessary.

In addition, the Project Applicant is requesting the following discretionary approvals from the County of Los Angeles for those portions of the Project site that are located within the unincorporated portions of Los Angeles County: adoption of a Specific Plan to regulate development within the County portions of the Project site; General Plan Amendments to establish a Specific Plan land use designation and deletion of the “East-West Road” as set forth in the County’s General Plan Circulation Element; Zone Change to effectuate the new Specific Plan; Tentative Tract Map; Grading Approvals; Development Agreement; and any additional actions that may be determined necessary.

In addition, the Project Applicant is requesting modification to the City and County jurisdictional boundaries through a Petition for Reorganization application with the Local Agency Formation Commission (LAFCO).

**ANTICIPATED WATER DEMAND**

Development of the proposed Project, as identified above, would consist of a range of land uses. The forecast of the Project's anticipated water demand takes into account existing buildings, which currently consume water, which would be demolished as part of the Project, as well as the water that would be consumed by the new development. A detailed forecast of the Project's net water demand (gross new development minus existing development) is provided as Table 1 and is attached to this letter. In addition to the water consumed within the proposed buildings themselves, a project-specific forecast of landscape water usage is also provided in lieu of using the LADWP's standard outdoor water usage factors. Documentation in support of the water demand factors used for the irrigated landscaped areas is provided as Attachments A and B to this letter.

Development of the proposed Project, including all proposed uses and irrigated areas, would consume a forecasted 1.12 million gallons on an average day (net new consumption). This
forecast represents the maximum amount of water that is anticipated to be consumed at the Project site. The Project Applicant is, and will continue to be, committed to the use of recycled water. As such, a large amount of recycled water is currently used on the Project site and the Applicant is committed to extend its current recycled water use to include the Project, subject to the ability of the LADWP to deliver recycled water to the Project site and the use of recycled water occurs in a manner consistent with the future practices under which the Project would be developed. For informational purposes, current recycled water use at the Project site is approximately 105 ac-ft/year.

If you have any questions regarding this request, please contact Jon Foreman at (213) 978-1888.

S. Gail Goldberg, AICP
Director

Jon Foreman
Environmental Review Coordinator

Attachments
Table 1: Water Consumption Under Proposed Project

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Amount of Development</th>
<th>Water Demand Rate (gpd) (1)</th>
<th>Net Water Consumption</th>
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<tbody>
<tr>
<td></td>
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<tr>
<td>CITY OF LOS ANGELES</td>
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<tr>
<td>Residential Retail (2)</td>
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<tr>
<td>Commercial Serv. (2)</td>
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</tr>
<tr>
<td>Studio</td>
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<tr>
<td>Studio Office</td>
<td></td>
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<tr>
<td>Child Care Center (6)</td>
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<tr>
<td>Entertainment</td>
<td></td>
<td></td>
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<tr>
<td>Irrigation (6)</td>
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</tr>
<tr>
<td>Project Summary</td>
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</table>

### Average Day Water Demand

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Unit</th>
<th>Demolition</th>
<th>Gross New Development</th>
<th>Net New Development</th>
<th>Quantity</th>
<th>Unit</th>
<th>gallons per Day (gpd)</th>
<th>Acre-Feet per Year (a-afy)</th>
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</thead>
<tbody>
<tr>
<td>CITY OF LOS ANGELES</td>
<td></td>
<td></td>
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<td>Residential</td>
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<td>Commercial Serv.</td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Studio</td>
<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Studio Office</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Child Care Center</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Entertainment</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Irrigation (6)</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Project Summary

Average Day Water Demand

- **Total Project**: 1,116,018
- **Peak Project**: 1,204,1

Notes:

- **Water demand rates supplied by the City of Los Angeles Bureau of Engineering.**
- **Assumes a water demand that reflects a weighted average of 60% retail and 40% restaurant - "full service indoor seat." For the restaurant use, assumes 3 seats per 100 square feet of floor area.**
- **The Bureau of Engineering water use rate for a hotel is 130 gpd/room. As the hotel is likely to include banquet and retail facilities, for purposes of this analysis to provide a conservative estimate and to account for the additional water used by the banquet and retail facilities an additional 130 gpd/room is assumed. Therefore, the total water demand rate used in this analysis is 260 gpd/room.**
- **Amplitheater water demand based on the reduction of 3,021 seats at 4 GPD demand.**
- **Irrigation calculations provided as an Attachment to this table.**
- **Peak Flow Rate = 1.785[(Average Water Demand in MGD)*0.92] per ABCE Water Design Manual.**

Page 1070
Attachment A-1
City of Los Angeles

Irrigation Water Use Estimate - Mixed-Use Residential Area - Highly Irrigated

Background Information

This formula assumes turf use of less than 25% of the total landscape. The criteria defining this water use is as follows:

- Plant water use value selected is a medium use category, listed at $3.00
- Irrigation system efficiency is estimated at a 50/50 combination between high efficient stream rotor (80%) and conventional spray sprinklers (60%).

Regional Weather Data follows the published value for the City of Burbank, listed as 375,078.828 gallons per year.

Water Use Base Formulas:

Formula: BT Value x Landscape Value x Irrigated Area SF x 0.62 = Gallons per Year
- BT Value: 375,078.828 inches (per year) listed for Burbank, CA
- Landscape Value: Combination of plant water use value divided by the irrigation system delivery method.
- (overhead spray or stream rotor). The plant water use value is $3.00 and the irrigation efficiency rating scale roter @ 80% and spray sprinklers @ 60%.
- Irrigated Area SF:
  - Mixed-Use Residential Area
  - Existing Conditions = .50
  - Future Conditions = .50

BT Value:

Water Use Base Calculations for Projects

**Rotor sprinkler assigned areas**

<table>
<thead>
<tr>
<th>Project SF of area assignment</th>
<th>Existing</th>
<th>Future</th>
</tr>
</thead>
<tbody>
<tr>
<td>Existing</td>
<td>0.50 x</td>
<td>375,799 = 187,990</td>
</tr>
<tr>
<td>Future</td>
<td>0.50 x</td>
<td>2,081,638 = 1,015,819</td>
</tr>
<tr>
<td>Landscape Value = 0.50 / 0.60</td>
<td>= 0.625</td>
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</tr>
<tr>
<td>Rotor area formula:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Existing</td>
<td>51.67 x</td>
<td>0.625 x 187,990 x 0.62 = 3,762,147</td>
</tr>
<tr>
<td>Future</td>
<td>51.67 x</td>
<td>0.625 x 1,015,819 x 0.62 = 20,338,355</td>
</tr>
</tbody>
</table>

**Spray sprinkler assigned areas**

<table>
<thead>
<tr>
<th>Project SF of area assignment</th>
<th>Existing</th>
<th>Future</th>
</tr>
</thead>
<tbody>
<tr>
<td>Existing</td>
<td>0.50 x</td>
<td>375,799 = 187,990</td>
</tr>
<tr>
<td>Future</td>
<td>0.50 x</td>
<td>2,081,638 = 1,015,819</td>
</tr>
<tr>
<td>Landscape Value = 0.50 / 0.60</td>
<td>= 0.833</td>
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<td>Spray area formula:</td>
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<td></td>
</tr>
<tr>
<td>Existing</td>
<td>51.67 x</td>
<td>0.833 x 187,990 x 0.62 = 5,016,196</td>
</tr>
<tr>
<td>Future</td>
<td>51.67 x</td>
<td>0.833 x 1,015,819 x 0.62 = 27,118,473</td>
</tr>
</tbody>
</table>

**Total Irrigated Area Annual Water Use (Gallons per Year):**

3,762,147
20,338,355
15,976,019
5,016,196
22,182,277
15,778,361
20,457,328
38,078,585

Total Irrigated Area Daily Increase in Water Use: 38,078,985 / 365 = 105,970 GPD
Attachment A-1
City of Los Angeles

Irrigation Water Use Estimate - Studio, Entertainment & Business Areas - Highly Irrigated

Background Information
This formula assumes turf use of less than 25% of the total landscape. The criteria defining this water use is as follows:

- Plant water use value selected is a high use category, listed as 1.00.
- Irrigation system efficiency is estimated at a 50/50 combination between high efficient stream rotor (80%) and conventional spray sprinkler (60%).
- Regional Weather ET Data follows the published value for the City of Burbank, listed as 0.50 inches/year.

Water Use Base Formulas
Formula: ET Value x Landscape Value x Irrigated Area SF x 0.62 = Gallons per Year

- ET Value: [0.00] inches (per year) listed for Burbank, CA
- Landscape Value: Combination of plant water use value divided by the irrigation system delivery method (overhead spray or stream rotor). The plant water use value is 0.80. The irrigation efficiency ratings are: rotors @ 0.80 (high) and spray sprinklers @ 0.50 for the specific areas assigned.
- Irrigated Area SF:
  - Studio, Entertainment & Business Areas:
    - Existing Conditions = Studio, Entertainmen & Biz Area SF
    - Future Conditions = Studio, Entertainmen & Biz Area SF
  - Existing - Future = coefficient for converting cubic volume into gallons (1 CF = 7.48 gallons)

Water Use Base Calculations for Project:

**Rotor Sprinkler Assigned Areas**

<table>
<thead>
<tr>
<th>Project SF of area assignment</th>
<th>Existing</th>
<th>Future</th>
<th>Landscape Value</th>
<th>Rotor area formula:</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>0.50</td>
<td>0.50</td>
<td>0.80</td>
<td>1.00</td>
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<td></td>
<td>51.67</td>
<td>54.599</td>
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**Spray Sprinkler Assigned Areas**

<table>
<thead>
<tr>
<th>Project SF of area assignment</th>
<th>Existing</th>
<th>Future</th>
<th>Landscape Value</th>
<th>Spray area formula:</th>
</tr>
</thead>
<tbody>
<tr>
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<td>0.50</td>
<td>0.50</td>
<td>0.80</td>
<td>1.33</td>
</tr>
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<td></td>
<td>51.67</td>
<td>54.599</td>
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<td></td>
</tr>
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</table>

**Total Irrigated Area Annual Water Use (Gallons per Year):**

<table>
<thead>
<tr>
<th>Landscape Value</th>
<th>86.895</th>
<th>874.550</th>
<th>788.455</th>
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<td>Project SF</td>
<td>114.794</td>
<td>1,166.607</td>
<td>1,017.594</td>
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<tr>
<td>Total</td>
<td>200,882</td>
<td>2,063,341</td>
<td>1,825,263</td>
</tr>
</tbody>
</table>

**Total Irrigated Area Daily Increase in Water Use:**

1,839,729 / 365 = 5,040 GPD
Attachment A-1  
City of Los Angeles  

Irrigation Water Use Estimate - Highly Irrigated - Summary  

<table>
<thead>
<tr>
<th>category</th>
<th>usage (acre-feet)</th>
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</thead>
<tbody>
<tr>
<td>Studio, Entertainment &amp; Business Areas</td>
<td>5,040</td>
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<tr>
<td>Mixed-Use Residential Area</td>
<td>102,970</td>
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<tr>
<td>Total</td>
<td>107,910</td>
</tr>
<tr>
<td>Total</td>
<td>111,010</td>
</tr>
</tbody>
</table>
Attachment A-2
City of Los Angeles

Irrigation Water Use Estimate - Mixed-Use Residential Area - Modestly Irrigated

Background Information
This formula assumes turf use of less than 25% of the total landscape. The criteria defining this water use is as follows:
- Plant water use value selected is a low (native) use category, listed at
- Irrigation system efficiency is estimated at a 90/10 combination between high efficient stream rotor (80%) and conventional spray sprinklers (60%).
- No turf areas are a part of this estimate.
- Regional Weather ET Data follows the published value for the City of Burbank, listed as 1.0 inches per year.

Water Use Base Formula:
Formula: ET Value * Landscape Value * Irigated Area SF = 0.62 = Gallons per Year
ET Value: 0.0209 inches (per year) listed for Burbank, CA
Landscape Value: Combination of plant water use values divided by the irrigation system delivery method (overhead spray or stream rotor). The plant water use value is (low) and the irrigation efficiency ratings are rotors @ and spray sprinklers @ for the specific areas assigned.
Irrigated Area SF:
Mixed-Use Residential Area
Existing Conditions
Future Conditions

coefficient for converting cubic volumes into gallons (1 CF = 7.48 gallons)

Water Use Base Calculations for Project

**Rotors Sprinkler Assigned Areas**

<table>
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<th>Project SF of area assignment:</th>
<th>Existing</th>
<th>Future</th>
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<tbody>
<tr>
<td>Landscape Value =</td>
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<td>Rotors area formula:</td>
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</tr>
<tr>
<td>Existing:</td>
<td>0.325</td>
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</tr>
<tr>
<td>Future:</td>
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**Spray Sprinkler Assigned Areas**

<table>
<thead>
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<th>Project SF of area assignment:</th>
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<th>Future</th>
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</thead>
<tbody>
<tr>
<td>Landscape Value =</td>
<td>0.30</td>
<td>0.500</td>
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<tr>
<td>Spray area formula:</td>
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<td>51.67 x</td>
</tr>
<tr>
<td>Existing:</td>
<td>0.500</td>
<td>0.500</td>
</tr>
<tr>
<td>Future:</td>
<td>0.500</td>
<td>0.500</td>
</tr>
</tbody>
</table>

**Total Irrigated Area Annual Water Use (Gallons per Year):**

- Existing: 13,911,373
- Future: 15,777,445
- Total: 29,688,818
- Average: 2,946,897

**Total Irrigated Area Daily Increase in Water Use:**

- 365 days
- 4,072 GPD
Attachment A-2
City of Los Angeles

Irrigation Water Use Estimate - Studio, Entertainment & Business Areas - Modestly Irrigated

**Background Information**

This formula assumes turf use of less than 25% of the total landscape. The criteria defining this water use is as follows:

Plant water use value selected is in a medium use category, listed at the rate of 0.625 (medium) and the irrigation efficiency ratings are rotors @ 80% and spray sprinklers @ 60%.

Irrigation system efficiency is estimated at a 50/50 combination between high efficient stream rotor (80%) and conventional spray sprinklers (60%).

Regional Weather ET Data follows the published value for the City of Burbank, listed as 3.62

**Water Use Base Formula:**

Formula: ET Value x Landscape Value x Irrigated Area SF x 0.62 = Gallons per Year

<table>
<thead>
<tr>
<th>ET Value</th>
<th>Landscape Value</th>
<th>Irrigated Area SF</th>
<th>0.62</th>
</tr>
</thead>
<tbody>
<tr>
<td>(Overhead spray or stream rotor)</td>
<td>(Medium use value)</td>
<td>(SF Area)</td>
<td>(Volume)</td>
</tr>
</tbody>
</table>

Irrigated Area SF:

Studio, Entertainment & Business Areas:

- Existing Conditions: 51.67
- Future Conditions: 51.67

**Coefficient for converting cubic volume into gallons (1 CF = 7.5 gallons)**

**Water Use Base Calculations for Project:**

1. **Rotor Sprinkler Assigned Areas**

<table>
<thead>
<tr>
<th>Project SF of area assignment:</th>
<th>Existing:</th>
<th>Future:</th>
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</thead>
<tbody>
<tr>
<td>Landscape Value =</td>
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<td>124,916</td>
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<td>Rotor area formulas:</td>
<td>Future:</td>
<td>0.50 x</td>
</tr>
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<td>51.67 x</td>
<td>124,916</td>
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<tr>
<td>Future:</td>
<td>51.67 x</td>
<td>89,623</td>
</tr>
</tbody>
</table>

2. **Spray Sprinkler Assigned Areas**

<table>
<thead>
<tr>
<th>Project SF of area assignment:</th>
<th>Existing:</th>
<th>Future:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Landscape Value =</td>
<td>0.50 x</td>
<td>124,916</td>
</tr>
<tr>
<td>Spray area formulas:</td>
<td>Future:</td>
<td>0.50 x</td>
</tr>
<tr>
<td>Existing:</td>
<td>51.67 x</td>
<td>124,916</td>
</tr>
<tr>
<td>Future:</td>
<td>51.67 x</td>
<td>89,623</td>
</tr>
</tbody>
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**Total Irrigated Area Annual Water Use (Gallons per Year):**

<table>
<thead>
<tr>
<th>Rotors</th>
<th>2,501,074</th>
<th>1,789,423</th>
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</thead>
<tbody>
<tr>
<td>Sprays</td>
<td>3,344,765</td>
<td>2,392,577</td>
</tr>
<tr>
<td>Total</td>
<td>5,845,839</td>
<td>4,182,000</td>
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**Total Irrigated Area Daily Increase in Water Use:**

(1,648,823) / 365 = (4,517) GPD
Attachment A-2
City of Los Angeles

Irrigation Water Use Estimate – Modestly Irrigated – Summary

<table>
<thead>
<tr>
<th>Area</th>
<th>Water Use (Mgal)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Studio, Entertainment &amp; Business Areas</td>
<td>(4,517)</td>
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<tr>
<td>Mixed-Use Residential Area</td>
<td>8,072</td>
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<tr>
<td>Total</td>
<td>3,555</td>
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</table>
Attachment B-1
County of Los Angeles
Irrigation Water Use Estimate - Studio, Entertainment & Business Areas - Highly Irrigated

Background Information
This formula assumes turf use of less than 25% of the total landscape. The criteria defining this water use is as follows:

Plant water use value selected is a high use category, listed at:

Irrigation system efficiency is estimated at a 50/50 combination between high efficient stream rotor (80%) and conventional spray sprinklers (60%).

Regional Weather BT Data follows the published value for the City of Burbank, listed as

Water Use Base Formula:
Formula: BT Value x Landscape Value x Irrigated Area SP x 0.62 = Gallons per Year
BT Value: 88 inches (per year) listed for Burbank, CA
Landscape Value: Combination of plant water use value divided by the irrigation system delivery method (overhead spray or stream rotor). The plant water use value is 0.001000 (high) and the irrigation efficiency ratings are: rotors @ and spray sprinklers @

Irrigated Area SP:
Studio, Entertainment & Business Areas:
Existing Conditions = af
Future Conditions = af
af = coefficient for converting cubic volume into gallons (1 CF = 7.48 gallons).

Water Use Base Calculations for Projects:
Rotor Sprinkler Assigned Areas -
<table>
<thead>
<tr>
<th>Project SP of area assignment:</th>
<th>Existing</th>
<th>0.50</th>
<th>435,984</th>
<th>217,992</th>
</tr>
</thead>
<tbody>
<tr>
<td>Future</td>
<td>0.50</td>
<td>1,628,720</td>
<td>814,360</td>
<td></td>
</tr>
<tr>
<td>Landscape Value =</td>
<td>0.30</td>
<td>/</td>
<td>0.30</td>
<td>/</td>
</tr>
<tr>
<td>Rotor area formula:</td>
<td></td>
<td></td>
<td>=</td>
<td>1.00</td>
</tr>
<tr>
<td>Existing</td>
<td>51.67</td>
<td>x</td>
<td>1.000</td>
<td>x</td>
</tr>
<tr>
<td>Future</td>
<td>51.67</td>
<td>x</td>
<td>1.000</td>
<td>x</td>
</tr>
</tbody>
</table>

Spray Sprinkler Assigned Areas -
<table>
<thead>
<tr>
<th>Project SP of area assignment:</th>
<th>Existing</th>
<th>0.50</th>
<th>435,984</th>
<th>217,992</th>
</tr>
</thead>
<tbody>
<tr>
<td>Future</td>
<td>0.50</td>
<td>1,628,720</td>
<td>814,360</td>
<td></td>
</tr>
<tr>
<td>Landscape Value =</td>
<td>0.50</td>
<td>/</td>
<td>0.50</td>
<td>/</td>
</tr>
<tr>
<td>Spray area formula:</td>
<td></td>
<td></td>
<td>=</td>
<td>1.333</td>
</tr>
<tr>
<td>Existing</td>
<td>51.67</td>
<td>x</td>
<td>1.333</td>
<td>x</td>
</tr>
<tr>
<td>Future</td>
<td>51.67</td>
<td>x</td>
<td>1.333</td>
<td>x</td>
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</table>

Total Irrigated Area Annual Water Use (Gallons per Year):

<table>
<thead>
<tr>
<th></th>
<th>Irrigated Area</th>
<th>2077</th>
<th>19,464,887</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>26,088,348</td>
<td>25,472,183</td>
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</tr>
<tr>
<td></td>
<td>16,594,743</td>
<td>44,578,071</td>
<td></td>
</tr>
</tbody>
</table>

Total Irrigated Area Daily Increase in Water Use: 44,578,071 / 365 = 122,122 GPD
Attachment B-2
County of Los Angeles

Irrigation Water Use Estimate – Studio, Entertainment & Business Areas - Modestly Irrigated

Background Information
This formula assumes turf use of less than 25% of the total landscape. The criteria defining this water use is as follows:

- Plant water use value selected is a medium use category, listed at

- Irrigation system efficiency is estimated at a 50/50 combination between high efficient steam rotor (80%) and conventional spray sprinkler (60%).

Regional Weather BT Data follows the published values for the City of Burbank, listed as 7,823 inches/year.

Water Use Base Formula:

Formula: BT Value x Landscape Value x Irrigated Area SF x 0.62 = Gallons per Year

BT Value = 1,021.213 inches (per year) listed for Burbank, CA

Landscape Value: Combination of plant water use value divided by the irrigation system delivery method (overhead spray or steam rotor). The plant water use value is 2.68 (medium) and the irrigation efficiency ratings are: rotor @ 80% and spray sprinkler @ 60% for the specific areas assigned.

Irrigated Area SF:
- Studio, Entertainment & Business Areas:
  - Existing Conditions = 17,204
  - Future Conditions = 17,204

Water Use Base Calculations for Project:

### Rotor Sprinkler Assigned Areas

<table>
<thead>
<tr>
<th>Project SF of area assignment:</th>
<th>Existing</th>
<th>Future</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.50 x 1,021.213 = 510,607</td>
<td></td>
<td></td>
</tr>
<tr>
<td>0.50 x 722,389 = 376,195</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Spray Sprinkler Assigned Areas

<table>
<thead>
<tr>
<th>Project SF of area assignment:</th>
<th>Existing</th>
<th>Future</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.50 x 1,021.213 = 510,607</td>
<td></td>
<td></td>
</tr>
<tr>
<td>0.50 x 722,389 = 376,195</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Total Irrigated Area Annual Water Use (Gallons per Year):

<table>
<thead>
<tr>
<th></th>
<th>Existing</th>
<th>Future</th>
</tr>
</thead>
<tbody>
<tr>
<td>10,223,427</td>
<td>13,581,236</td>
<td></td>
</tr>
<tr>
<td>7,532,213</td>
<td>10,042,951</td>
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</tr>
<tr>
<td>6,691,214</td>
<td>6,588,385</td>
<td></td>
</tr>
<tr>
<td>5,833</td>
<td>5,833</td>
<td></td>
</tr>
</tbody>
</table>

Total Irrigated Area Daily Increase in Water Use:

\[
(5,279,499) / 365 = (17,204) \text{ GPD}
\]
EX. E
FIGURE 1 - WEST COAST BASIN
April 27, 2010

Mr. Thomas Erb,
Director of Water Resources
Los Angeles Department of Water and Power
111 North Hope Street Fl 15
Los Angeles, CA 90012-2607

Re: NBC Universal Evolution Plan/Recycled Water

Dear Mr. Erb:

As we have discussed, Universal City Studios L.L.P., L.P. proposes to develop its 391 acre property in Universal City. The proposed development, known as the NBC Universal Evolution Plan (formerly referred to as the Vision Plan), consists of up to 2.01 million square feet of net new commercial uses and 2,937 residential units. For planning purposes NBC Universal has organized the property into four Areas: Business Area, Entertainment Area, Studio Area and Mixed-Use Residential Area, as shown on Attachment A. NBC Universal is committed to designing and implementing a recycled water system in connection with the continued development of the Business, Entertainment and Studio Areas and proposed new development in the Mixed Use Area.

NBC Universal is committed to using recycled water in each of the Studio, Business, Entertainment and Mixed-Use Residential Areas. NBC Universal proposes that the recycled water system be designed to provide storage and distribution for the Studio, Business and Entertainment Areas with one system and for the Mixed Use Residential Area with another system. We anticipate that the Mixed Use Residential Area will ultimately be annexed into the City while the Studio, Business and Entertainment Areas will remain largely in the County.

In connection with the implementation of the Evolution Plan it is anticipated that the existing man-made water features that currently provide recycled water storage (Falls Lake, New Falls Lake and Upper Falls Lake) will be replaced with underground storage tanks and associated recycled water distribution lines within the Studio Area to serve the Studio, Business and Entertainment Areas. The new underground storage tanks would be sized to supply the recycled water demands of such Areas. It is currently projected that there will be up to ten underground storage tanks with a maximum size of 50,000 gallons for each individual tank, for a total storage capacity of up to approximately 500,000 gallons. We expect that the recycled water system for the Studio, Business and Entertainment Areas will be owned and maintained by NBC Universal as is the current recycled water system on the property.
In connection with the development of the proposed Mixed Use Residential Area, NBC Universal or the developer will design a new recycled water system as part of the back-bone utility system for the Mixed-Use Residential Area. This back-bone utility system will be constructed when the residential portion of the project is ultimately developed. The recycled water system for the Mixed-Use Residential Area will ultimately be owned, maintained and operated by the DWP, therefore, the components of the system will be constructed in accordance with DWP standard specifications (subject to applicable City and/or County requirements). NBC Universal will provide mutually satisfactory easements with reasonable access provisions to DWP to maintain the recycled water system in the Mixed-Use Residential Area.

The recycled water system in the Mixed-Use Residential Area would consist of an underground storage tank with an estimated 640,000 gallon capacity; any necessary associated hydropneumatic tanks, lift and/or water pump stations; a new 16 inch recycled water line from the existing DWP point of connection (west of NBCU building 9128 adjacent to the Los Angeles River Flood Control Channel) to the underground storage tank in the Mixed-Use Residential Area; and new water distribution lines from the underground storage tank to the irrigation and building connections in the Mixed-Use Residential Area (ranging from 6 to 12 inches). The 640,000 gallon capacity represents a supply of one peak day of storage for irrigation and dual plumbing in commercial buildings for the maximum development proposed in the Mixed-Use Residential Area under the Evolution Plan plus an additional 100,000 gallons. The actual size of the underground storage tank will be based on a calculation of the irrigation and dual plumbing supply needs for the actual permitted development in the Mixed-Use Residential Area. Pipe sizes may also change depending on a number of design criteria but would meet DWP requirements. Our current planning anticipates that the underground storage tank will be constructed upon completion of the initial grading for Open Space District 1. Open Space District 1 is shown on Attachment B. Since we do not know the date of the construction of the Mixed Use Residential Area we cannot provide for a specific date of construction for the recycled water system in that Area.

As I am sure you can appreciate, the ultimate design of the two systems will depend on a number of factors including the actual project approved by the City and County, the availability of committed recycled water quantities to serve the property, and the phasing of the Evolution Plan. We expect that the final requirements for the recycled water system will be included in the tentative tract map conditions for the property. In this manner the actual sizing of the various components of the systems can be worked out depending on the actual project approved by the City and County.

Further, NBC Universal continues to stand by its commitments stated in my July 8, 2008 letter to you regarding the Metro Universal station site development. As stated in that letter, NBC Universal agrees to work with Thomas Properties Group and DWP to identify a permanent alignment for the recycled water line connecting the existing recycled water line at the intersection of Forest Lawn Drive and Barham Boulevard to the proposed development at the Metro Universal station site on Lankershim Boulevard. As we discussed, a route through our core business areas is likely to be physically difficult given the density of existing structures and the existing infrastructure in those areas. It is our understanding that Thomas Properties Group
and DWP have identified a potential line that would traverse the proposed North-South road and Buddy Holly Drive. NBC Universal agrees to work with Thomas Properties Group and DWP on an expedited basis to determine if that route is mutually agreeable, or to identify another mutually agreeable route, agreement to which will not be unreasonably withheld.

Please be assured that NBC Universal is committed to using recycled water in connection with the Incremental Evolution Plan development as has been done for the NBC Universal property as a whole for years.

If you have further questions regarding this matter, please feel free to call me at (818) 777-2561.

Sincerely,

Thomas G. Smith
Senior Vice President
NBCU West Coast Real Estate
Response to Comment No. 12-363

Appendix S consists of a copy of the proposed Surplus Water Supply Augmentation Agreement between the LADWP and NBC Universal and exhibits included within the staff report prepared for the Board of Water and Power Commissioners in April 2010 and is referenced in Comment No. 12-26. As such, the commenter is referred to Response to Comment No. 12-26, above.

Comment No. 12-364

See next page
The Los Angeles City Council gave final approval today to a new water rationing schedule that will let Department of Water and Power customers turn on their sprinklers three days a week.

Customers are currently allowed to irrigate their lawns for only up to 15 minutes on Mondays and Thursdays, before 9 in the morning or after 4 in the afternoon, because of the drought.

Under the new schedule, odd-numbered addresses will water Mondays, Wednesdays and Fridays, and even-numbered addresses Tuesdays, Thursdays and Sundays, before 9 and after 4 to minimize evaporation.

To further encourage customers to save water, the DWP intends to increase the rebate on water-conserving sprinkler nozzles to $8 per nozzle, which covers the price.
Price, Reliability, and Quality

The Los Angeles Department of Water & Power, the nation's largest municipal utility, serving the water and electricity needs of the City of Los Angeles... 24 hours a day, 365 days a year. (800-342-5397)

LEARN ABOUT

NEW WATERING DAYS
NOW IN EFFECT

Are you odd or even?

If you have an odd-numbered address, your watering days are
Mondays, Wednesdays and Fridays.
If you have an even-numbered address, your watering days are
Tuesdays, Thursdays and Sundays.

LEARN MORE

Water Rates First Tier Allowance
Under Shortage Year Water Rates, first tier allotments are reduced by 15%. Customers can see their shortage year first tier water allotment by logging into their account or by calling 1-800-DIAL-DWP and using their CAN number from their bill to access their account information.

For information on the shortage year first tier water allowances (varies by customer class) go to: Water Rates or First Tier Charts for Single Dwelling Residential Units.
Response to Comment No. 12-364

Appendix T consists of a print out of websites regarding water supply in the City of Los Angeles and is referenced in Comment No. 12-26. As such, the commenter is referred to Response to Comment No. 12-26, above.

Comment No. 12-365

See next page
When Will Los Angeles Run Out of Water?
Sooner Than You Think.

L.A. has two options: Pray for rain, or suck off Northern California's supply. Guess which one it's going to try first?

Somewhere in sands of the desert
A shape with lion body and the head of a man
A gaze blank and pitiless as the sun
Is moving its slow thighs, while all about it
Reel shadows of the indignant desert birds.

-- William Butler Yeats, "The Second Coming"

Los Angeles has been sleeping far too long. But the question is not when will it wake, but rather what it will do once it does wake and realize the water is gone.

"We are way better than Third-World countries with no water supply," explains California Department of Water Resources drought coordinator Wendy Martin, "but it will take a significant change to keep ours."

Martin is speaking of California at large, but the science is in and the climate crisis isn't hard to figure out. So that makes Los Angeles the state's parched problem.

According to the Los Angeles Times, the state's water is nearly finished, which leaves California with two options: Pray for rain, or suck off Northern California's supply. Guess which one it's going to try first?

If you guessed both, you're right. Indeed, California will revive a decades-old plan for a statewide water bank that will flow water to where it is needed most. Right now that means it flows from Northern California farmers and others to agencies in Southern California, whose citizens have lately been engaging in Option Two rather than studying.
up on reality -- specifically, the geographical and environmental kind.

"We as a state entity looking out for the broader good," Department of Water Resources Director Lester Snow told the Times, "are not going to allow somebody to have 100 percent supplies and be hosing off sidewalks while a community has no fire protection and poor-quality water to drink."

He may not have mentioned Los Angeles by name, but anyone who has ever read Day of the Locust or seen "Chinatown" could tell you that Los Angeles has always been a managed fantasy. Like its redheaded stepchild Las Vegas, it's a consumption and recreation oasis in the desert running on Hollywood simulations and immigrant labor, which is to say distractions from its more geographical reality.

It has water on its beaches, but rarely anywhere else. For that, it has drained someone else's supply for centuries. Which brings us back to the future of Los Angeles, whose Sierra snowpack will likely evaporate under the weight of global warming's changed game.

With declining snowfall and earlier snowmelt, there is nothing Los Angeles can do but borrow someone else's water and get its hyperreal and hyperconsumptive act together. "Los Angeles doesn't treat water like it lives in a desert," explains Martin. "Our director made it clear that we would not impact Northern California so Southern California could wash off their driveways. People who are participating in the bank will have to be forced to change their behavior."

Behavior modification is the only way Los Angeles can extend, but not prevent, what some scientists are saying will be a permanent drought for not just the sunshine-and-noir metropolis but also for most, if not all, of the American Southwest. Sustainability exercises and policies will go a long way to mitigating the desert's reclamation of its lands from Hollywood and Hummers, but the Dust Bowl had nothing on what's coming to California. And it's coming to stay.

"I don't know what permanent drought even means," admits Martin. "We have recorded the history of water in California for over 100 years, and that's nothing. We don't know where we are at. But what permanent drought means to me is that if we are getting drier, then we need to change the way we use our water."

Martin suggests the usual no-brainers: Short showers, low-flow everything, no lawns, total conservation, and so on. But these are all
wonderful solutions in search of a population that cares. A recent sustainability forum attended by Los Angeles Mayor Antonio Villaraigosa, L.A. Department of Water and Power, Heal the Bay, and more was a wonderful outreach opportunity, with one all-important caveat: Attendance wasn't mandatory.

And therein lies California's problem, especially if it wants to prevent a NorCal/SoCal showdown over blue gold that could rewrite the state's borders. The drought that California, and especially Los Angeles, faces is a life-threatening crisis that has been treated like a cold. There is no corner of the city or state that it will not touch. If not treated immediately, it will start out as a serious pain in the ass, forcing citizens to alter their behavior and consumption with restrictive codes and financial penalties.

Then it will worsen, as the division between who gets water (the rich, the north) and who doesn't (the poor, the south) causes rampant itching and, as author Nathanael West predicted, lots of burning of lots of things.

Once malignant, it will force evacuations and realignments. By 2100, you will not recognize it. But even at this late date, I am watching the citizenry piss its water away, unaware of how it appeared in the first place. I see hybrids for sure, but also vacant mothers in empty Hummers.

I see water gushing into the gutters, carrying grime, toxins and other destructive chemicals into the sea, whose desalination remains one of Los Angeles' only playable cards on the hustler's table. I see extravagant lawns that are like gorgeously tended middle fingers to reality, which, like death and taxes always, has a way of winning in the end.

Most importantly, I see a public unready to accept the inevitable: That it lives in a desert, and that the desert is going dry with accelerating lethality. "I put this down to the myth of abundance that we all grew up with, coupled with a false First-World belief that technology can fix whatever goes wrong," says Maude Barlow, a water commodification and policy expert and the author of Blue Gold and Blue Covenant.

"We all learned long ago that water circles through the hydrologic cycle and we cannot destroy it, but this is patently false. Yet it is still held dear to our hearts. Now that the evidence is before our eyes, rather than changing our behavior, we trust that some modern
machine will take care of us. We simply cannot come to think of ourselves as just another species that must adapt or die."

The good news is that eventually the planet takes care of these decisions for us if we don’t act on them. Sustainability options are available, from the no-brainers mentioned by Martin to more ambitious exercises in solar development, water conservation and onward.

As the planet changes, so may its people, who have survived droughts and ice ages with ingenuity and hardiness. Indeed, the science of conservation is on the cusp of a cultural breakthrough, and the only thing that can stop it is, say, America nuking Iran or electing someone who will only push it harder down its destructive path. Which is why it is imperative that the United States, and its slumbering cities, get on the same page.

"What we are starting to see, and the science is supporting it over time," adds Martin, "is that the weather patterns are shifting and the trajectory is upward on continued diminishment. What we do know is that, because of the depletion of the aquifers, it will take a gully-washer to just get us back to square one. But we still abuse the resource, and we can’t afford to do that anymore. People need to understand the true value of water. What amazes me is that it doesn’t take much effort to do the right thing."

And that doesn’t just go for the people, but also the politicians they elect to represent their best interests. And right now, that means taking control of what's left of California's water. The state will have to sooner or later, unless it wants to leave life's necessities to the stock market.

"The situation is such that the state may have to take control eventually of its water resources as a public trust, and allocate on a priority basis," counsels Barlow. "Water for ecological health of the system first, for drinking water and restricted daily use for citizens, water for local food production, and water for commerce and export last. As for water trading, I warn people against allowing it to become controlled by private brokers."

But you can’t commodify what you can’t capture, and the public and the brokers that rip it off won’t have gushing taps forever. Again, behavior modification will only postpone the inevitable. Eventually, Los Angeles will walk off into the sunset a desert reclaimed. Like other desert cities, it may survive the transformative upheaval, but it will
have to suck water from sand to stay alive in its current state. Water wasters might want to get to work on finding a new state. Of mind, if possible.
Response to Comment No. 12-365

Appendix U1 consists of what appears to be a print out of an online article regarding water and is referenced in Comment No. 12-26. As such, the commenter is referred to Response to Comment No. 12-26, above.

Comment No. 12-366

See next page
The Ten Biggest American Cities That Are Running Out Of Water

By Charles B. Stockdale, Michael B. Sauter, Douglas A. McIntyre

Some parts of the United States have begun to run low on water. That is probably not much of a surprise to people who live in the arid parts of America that have had water shortages for decades or even centuries. No one who has been to the Badlands in South Dakota would expect to be able to grow crops there.

The water problem is worse than most people realize, particularly in several large cities which are occasionally low on water now and almost certainly face shortfalls in a few years. This is particularly true if the change in global weather patterns substantially alters rainfall amounts in some areas of the US.

Wall St. looked at an October 2010 report on water risk by environmental research and sustainability group Ceres. We also considered a comprehensive July 2010 report from the Natural Resources Defense Council, which mapped areas at high risk of water shortage conflict. Wall St. also did its own analysis of water supply and consumption in America's largest cities, and focused on the thirty largest metropolitan areas. One goal was to identify potential conflicts in regions that might have disputed rights over large supplies of water and the battles that could arise from these disputes. And, Wall St. examined geographic areas that have already been plagued by drought and water shortages off and on.

The analysis allowed us to choose ten cities that are likely to face severe shortages in the relatively near-term future. Some of these are likely to be obvious to the reader. The area around Los Angeles was once too dry to sustain the population of a huge city. But infrastructure was built that allowed water to be pumped in from east of the region. Las Vegas had similar problems. It was part of a great desert until Lake Mead was created by the Hoover Dam built on the Colorado River.

Severe droughts that could affect large cities are first a human problem. The competition for water could make life in some of America's largest cities nearly unbearable for residents. A number of industries rely on regular access to water. Some people would be out of work if these industries had poor prospects for continued operation. The other important trouble that very low water supplies creates is that cities have sold bonds based on their needs for infrastructure to move, clean and supply water. Credit ratings agencies may not have taken drought issues into account at the level that they should. Extreme disruptions of the water supply of any city would have severe financial consequences.

The Natural Resources Defense Council (NRDC) report takes the following into account when assessing the likelihood of water shortages: "The risk to water sustainability is based on the following criteria: (1) projected water demand as a share of available precipitation; (2) groundwater use as a share of projected available precipitation; (3) susceptibility to drought; (4) projected increase in freshwater withdrawals; and (5) projected increase in summer water deficit."

The ten cities on this list are the ones with the most acute exposure to problems that could cause large deficiencies of water supply and demand. There are a number of metropolitan areas that could face similar problems but their risks are not quite as high. The water problem for U.S. cities is, although it may not be evident, one of the largest issues that faces urban areas over the next ten years.

These are the ten largest cities by population that have the greatest chance of running out of water.

10. Orlando, Fla.

Major Water Supply: Floridan Aquifer
Population (U.S. rank): 235,860 (80th)
Population Growth Rate: 26.8% since 2000
Average annual rainfall: 48.35 in.

North-central Florida, especially Orange County where Orlando is located, has experienced frequent droughts in the last decade. As a consequence, the area has implemented extreme conservation measures, including aggressive water-rationing policies and lawn-watering bans. After the drought and resulting wildfires subsided, however, Orlando faced another problem. As of 2013, Orlando will no longer be able to increase the rate at which it uses water from the Floridan aquifer, the city's main source of fresh water supply. This presents a major problem for city officials: how does the limited water supply continue to meet demand for one of the fastest-growing regions in the state? It is estimated that water usage in the Orlando area will increase from 526...
9. Atlanta

Population (U.S. rank): 540,922 (33rd)
Population Growth Rate: 29.9% since 2000
Average annual rainfall: 50.2 in.

Between 2007 and 2008, the Southeast experienced a major drought, which depleted the region's major water supplies. No city in the south suffered more than Atlanta, the second-fastest-growing metropolitan area in the last eight years. The crisis began when the Army Corps of Engineers released more than 20 billion gallons of water from Lake Lanier, the city's primary source of water. Continued poor rainfall brought the lake to its lowest recorded levels. At one point, city officials reported there was only three months left of stored fresh water to supply Atlanta. The drought eventually subsided and consistent rain returned the lake to less dangerous levels. However, Atlanta may continue to be at risk, as the lake is the site of an ongoing legal conflict between Georgia, Alabama and Florida, all of which rely on the reservoir for fresh water. Last year, a federal judge declared Atlanta's withdrawals from the lake illegal, and if the ruling stands, the city will lose roughly 40% of its water supply by 2012.

8. Tucson, Ariz.

Major Water Supply: Local ground water
Population (U.S. rank): 543,000 (32nd)
Population Growth Rate: 20% since 2000
Average Annual Rainfall: 12.17 in.

The NRDC study rates Pima County, Ariz., where Tucson is located, as an area with extreme risk of water shortage. The city is in the Sonoran Desert, an extremely arid region that receives less than 12 inches of rainfall each year. Currently, the Tucson region uses about 350,000 acre-feet of water per year. At this rate, Tucson's groundwater supply, which now provides the majority of the city's water, has a very limited life span. In addition to this, the city is currently bringing in 314,000 acre-feet per year from the Colorado River under the Central Arizona Project. However, Tucson is growing rapidly. This, combined with the political uncertainty of the Central Arizona Project allocation, places Tucson at extreme risk for future water shortages.

7. Las Vegas

Major Water Supply: Lake Mead/Colorado River
Population (U.S. rank): 567,000 (28th)
Population Growth Rate: 18.6% since 2000
Average Annual Rainfall: 4.5 in.

In the middle of the Mojave Desert, with an annual precipitation rate of only 10 cm, Las Vegas must rely on distant sources for its fresh water. The city's main source is Lake Mead, which supplies 85% of the water used in the Las Vegas Valley. Unfortunately, the lake is 59% empty and is approaching its first water shortage ever. In addition to Las Vegas, it would affect other areas of Nevada and Arizona. Moreover, it could potentially stop the Hoover Dam from producing electricity — as soon as 2013. This would affect many big California cities that receive hydroelectric power through the dam.

6. Fort Worth, Texas

Major Water Supply: Multiple
Population (U.S. rank): 727,577 (17th)
Population Growth Rate: 36.1% since 2000
Average annual rainfall: 34.01 inches

As Fort Worth continues to grow (its population is expected to hit 4.3 million by 2060), the amount of water demand has continued to exceed the amount of water available through local supply. As a result, the city, which is in Tarrant County, must rely on storage water, making the system much more exposed to the worst effects of prolonged drought. To remedy this problem, the Tarrant Regional Water District is trying to bring in more water from Oklahoma's Red River. Oklahoma, wishing to preserve its water sources, limits interstate water sales. Fort Worth has countered with a lawsuit, which is pending in the U.S. Court of Appeals.

5. San Francisco Bay Area

Major Water Supply: Various, including Lake Hetch Hetchy
Population (U.S. rank): San Francisco: 815,359 (12th), Oakland: 409,189 (44th), San Jose: 964,695 (10th)
Population Growth Rate: 20% since 2000
Average annual rainfall: 20.4 in.

Much like the Southeast in the early 2000's, California has experienced intermittent droughts that have brought the area's water supply to the brink of disaster. After several years of drought between 2005 and 2007, the Bay Area, which represents more than 3.7 million people, was forced to adopt aggressive water usage restrictions. Legal battles ensued between San Francisco area legislators and those in the Sacramento delta who...
believed they deserved Bay Area water from major sources, like Lake Hetch Hetchy. According to the NRDC and Ceres studies, the San Francisco Bay Area, including adjacent cities San Jose and Oakland, are "very likely" to experience a severe crisis as a result of water shortage within the next 50 years.

4. San Antonio, Texas

**Major Water Supply:** Various ground water sources
**Population (U.S. rank):** 1,373,668 (7th)
**Population Growth Rate:** 20% since 2000
**Average annual rainfall:** 30.24 in.

Bexar County, Texas, where San Antonio is located, possesses the highest rating given by the Natural Resources Defense Council with regards to water sustainability. This means that the area is at extremely high risk for water demand exceeding supply by 2050 if no major systematic changes are made. As most surface water from lakes and rivers in Texas have already been claimed by varying districts across Texas, most counties are now looking at groundwater to meet future demand. San Antonio has attempted to secure water from a number of Texas groundwater conservation districts. Due to legal obstacles, this has proven to be difficult. Today, many experts, including members of the Texas Water Development Board, recommend undertaking a major project to ensure future sustainability, such as a desalination plant on the Gulf Coast.

3. Phoenix

**Major Water Supply:** Colorado River Basin
**Population (U.S. rank):** 1,593,659 (5th)
**Population Growth Rate:** 21.2% since 2000
**Average annual rainfall:** 8.3 in.

Like many of the other western cities on this list, Phoenix is extremely dependent on water imported from the Colorado River. This is because nearly half of the water the city's residents use comes from this significant source. As the Colorado River Basin enters the eleventh year of its drought, the city's reliance on the river may soon become a serious problem. If the drought continues, water deliveries to Arizona could potentially be cut back. To keep up a sufficient water supply, Phoenix is adopting an aggressive campaign to recycle water, replenish groundwater and try to dissuade over-consumption. Time will tell if these measures will be enough.

2. Houston

**Major Water Supply:** Jasper Aquifer, Lake Houston, Lake Conroe
**Population (U.S. rank):** 2,257,926 (4th)
**Population Growth Rate:** 15.6% since 2000
**Average annual rainfall:** 53.34 inches

Throughout most of its history, the city of Houston primarily drew water from the Jasper Aquifer, located along the southeastern coast of Texas. Over the last 30 years, the city began to suffer from dramatic rises in sea level of nearly an inch a year. Geologists eventually realized that the cause was Houston's withdrawal of fresh water from the aquifer located under the city. This discovery forced city officials to use nearby Lake Houston and Lake Conroe for municipal water instead of the aquifer. Since 2000, Houston has been the fifth fastest-growing city in the country, and its presence in an area with high drought likelihood makes it an immediate risk for serious water shortages.

1. Los Angeles

**Major Water Supply:** Colorado River Basin
**Population (U.S. rank):** 3,831,868 (2nd)
**Population Growth Rate:** 3.7% since 2000
**Average annual rainfall:** 14.77 in.

In the 1980's, Los Angeles suffered a major crisis when the city was forced to stop using 40% of its drinking water due to industrial runoff contamination. Like Las Vegas, the city now relies on importing water from the Colorado River via hundreds of miles of aqueducts. The Colorado may only be a temporary solution, however, as the city continues to increase its demand at an unsustainable rate. In its utility risk rating, Ceres gave the Los Angeles Department of Water & Power the highest likelihood of risk among the cities it assessed. That list included Atlanta and the Fort Worth area. On top of this, the Hoover Dam, which is the main source of electricity for L.A. and much of the greater Southwest, is also producing at a lower rate than it has historically. Some scientists suspect this drop-off will continue to a point where its electricity production is too small to sustain the dam economically. Los Angeles, even if the dam doesn't cease production in 2013, as some predict, still faces serious water shortages.

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- Markets Expect Political Gridlock But Are Worried About Taxes
- America's Happiest Companies

Follow Yahoo! Finance on Twitter; become a fan on Facebook.
People will realize water is so important in our daily life, pretty soon water will be expensive than gas. How can we survive without water. We complain gas is expensive this days, even worst if water will surpassed the price of gas...and this will happen in a matter of time.

Pretty soon the water will be expensive than gas... Its a matter of time.

It's called overpopulation! There are too many people and spreading them out still doesn't stop them from drinking. All immigration must be stopped in all countries and birth control measures need to be enacted to lower our population down to a respectable. The ones who call for continuous population growth are stupid, self centered idiots. Wake up people... We didn't have this problem back in the 50's when our population was 2 billion. Now its over 7.5 billion and we are realizing ALL resources are limited. Time to grow up and reduce our population.

I know....we'll ALL go back to where our ancestors came from and give the land back to the American Indians, who we took it from in the first place! Our karma is coming back to haunt us and you haven't even begun to see the beginning of these trends! And anyone who does not believe this does not spend much time researching what is happening.

Sending illegals back home would give not only our water & air a break but there'd be less traffic, less taxes, more jobs... It'd just be better for Americans all the way around.

Odd that all but Atlanta & Orlando have large anchor baby populations. Orlando's catching up tho.

Ft. Worth sits in the Barnett Shale, with numerous drill sites for natural gas. Each drill takes millions of gallons of fresh water, and the landscape in Tarrant County is peppered with them, not to mention surrounding areas. Gas drill sites have encroached into our neighborhoods ever closer as the gas companies strike regulation 'deals' with our cities. Not only is our fresh water supply being sucked up at a shocking rate, but the residual toxins...
are likely poisoning what's left. Water rates have just gone up again, with restrictions on usage tightening. While I believe it is in our interest to conserve resources, that idea does not seem to apply to the natural gas companies in operation here. If we don't blow up from a rig gone wrong, we'll dry up from over usage. Water is the new gold, the new oil. A day will come when control over water will be the power big business and the conglomerates seek.

Reply

A Yahoo! User Thu Nov 18, 2010 06:58 pm EST | Report Abuse 0 2
Desalinization is a farce, Ge has been working on it for years, if it was as successful as they say this article would not even been written, because they the government or the big money private investors would be saying we can desalinate on large scale- which we can't- and they are not claiming this even though al gore and others are claiming that they can control the atmosphere. HaHaHa!! Governments say the cost is to high even though we are talking about an element that sustains man kind. too costly????? so seeing that three quarters of the earth is covered in water and we cannot conquer it to save the human race how the hell can anyone believe that man can control the atmosphere and the Hoax global warming....

Reply

A Yahoo! User Thu Nov 18, 2010 06:53 pm EST | Report Abuse 1 1
Desalinization is a farce, Ge has been working on it for years, if it was as successful as they say this article would not even been written. Governments say the cost is to high even though we are talking about an element that sustains man kind. too costly????? so seeing that three quarters of the earth is covered in water and we cannot conquer it to save the human race how the hell can anyone believe that man can control the atmosphere and the Hoax global warming?

Reply
Response to Comment No. 12-366

Appendix U2 consists of an article from Yahoo! Finance and is referenced in Comment No. 12-26. As such, the commenter is referred to Response to Comment No. 12-26, above.

Comment No. 12-367

See next page
Lowered Expectations: The 2010 Urban Water Plan

WE'RE RUNNING OUT OF WATER
David Coffin

After decades of rosy water supply projections proclaiming a practically limitless supply, the new 2010 Urban Water Management Plan (UWMP) is coming to terms with a long overdue reality. Water supply hasn't grown as expected and isn't expected to grow substantially in the future.

UWMP's in the past twenty-five years routinely offered plans that projected supplies well above 700,000 acre feet (AF) and in many years at or above 800,000 AF but actual deliveries realized by the LADWP were well under averaging only 630,000 AF per year between 1988 and 2010. The 2010 draft UWMP released January 13th profoundly lowers long term projections up to 13 percent for normal and single dry years and up to 18 percent for multiple dry years which are almost comparable to projections published back in 1985. Since then however UWMP plans from 1990 and 2005 cited exceptionally higher water supplies that were 20 percent higher than 1985 levels.

The city's UWMP is a detailed report describing LADWP's water infrastructure, its water sources, its current and future plans, and a projection of the next 25 years water supply. The UWMP is cited by the LADWP in their Water Supply Assessments (more on that later), and by city planners and developers when evaluating new housing projects. It's also cited by the city's planning department when elements of the General Plan are drawn up.

So why have projections dropped so dramatically?

In recent years there has been a growing contradiction between 'sufficient' water supplies regularly cited by planning documents for new developments, and the city's strong arm tactics to force residents into conserving.

This disparity has been leading people to ask the obvious questions: Do we or do we not have enough water to sufficiently supply the residents of Los Angeles? And if water supplies are tight as the city and water department says they are, why do we continually come to the conclusion in these assessments that there are sufficient supplies?
The answers can be found in the document used to base future water supply which is the UWMP.

Past UWMP’s had far and away overestimated the water department’s future projections which allowed high density development to proceed unabated. The reports overestimated how much groundwater would be available in future years; they failed to reduce those estimations by subtracting groundwater recharge using imported water purchased from Metropolitan Water Department (MWD) and they assumed that the MWD would bail them out in dry and multi-dry years if supplies were not met by local supplies and LA’s own aqueduct system.

In recent years the UWMP was becoming an embarrassment. The absurdity of the previous UWMP’s played out in almost comedic fashion when the projections did not meet real deliveries.

This was particularly true between 2000 and 2008 when housing production and new water connections to them rose sharply. The city council was forced to approve an emergency water conservation ordinance that limited landscape watering to Monday’s and Thursdays and made it illegal to serve water in restaurants unless customers asked.

That was soon followed on nightly news with the mayor’s introduction of the LADWP Drought Busters; LADWP employees who would be given the authority to enforce the city’s strict ordinance by ticketing residents who watered on the wrong days.

In later months newscasts brought us dramatic videos almost nightly of water mains literally bursting at the seams and flooding streets throughout the city.

The folly continued until a panel of academics hired by the LADWP concluded that it was the ill-engineered ordinance limiting landscape water to two days a week that caused water mains to cycle between sudden high and low pressures and thus crack.

Then there is the damning evidence, the thirty years of data which demonstrated that for all the ink spent in past reports about increasing water supply through various schemes such as increased
storage, recycled water, capturing storm water runoff, the city's annual water deliveries would not break what has become the 700,000 AF glass ceiling.

Will the new 2010 Urban Water Management Plan's reserved assessment offer us some relief from the aggressive development that came with the overstated assessments we have saw over the last decade? Perhaps, and then, perhaps not.

According to previous management plans, the UWMP “is only a guideline.” The decision to provide water connections to new projects, thus manage growth is a political decision; and I might add that it’s not the result of any calculation that considers both supply and demand. Given that, you won’t find any new verbiage in the 2010 plan that protects the community by linking development to water supply, real or projected.

If there is any relief in sight it will probably have to be the result of political pressure or a court decision. With far lower projections in this latest plan it would not be unreasonable for residents to expect, even demand a moratorium on new developments.

Water supply has dropped to dangerously low levels when projects were approved and built within the scope of the previous UWMP projections. The margin of safety is gone.

Officials can't keep ducking from reality and ignore the regions limits to water supply and then compound the problem by repeatedly approving new developments that consume more water. It's a one-way ticket to disaster.

*(David Coffin is a long-time activist and an occasional contributor to CityWatch. He blogs at westchesterparents.org and can be reached at david@westchesterparents.org)* -cw
Response to Comment No. 12-367

Appendix U3 consists of an article from City Watch LA and is referenced in Comment No. 12-26. As such, the commenter is referred to Response to Comment No. 12-26, above.

Comment No. 12-368

See next page
Response to Comment No. 12-368

Appendix V consists of a Google map image of the project area and is referenced in Comment No. 12-30. As such, the commenter is referred to Response to Comment No. 12-30, above.

Comment No. 12-369

See next page
Los Angeles Unified School District
Facilities Services Division

TO: Jon Foreman
City Planner/Project Coordinator
Department of City Planning
200 N. Spring Street, Room 601
Los Angeles, CA 90012

FROM: Rena Perez, Director
Master Planning & Demographics

SUBJECT: Environmental Impact Report Information Requested for: Universal City Vision Plan, 100 Universal City Plaza, Universal City, CA 91608

Included please find two LAUSD Schools Enrollments and Capacities Reports for the schools that may be impacted by the development project(s) in question. These reports contain data on each school’s current and projected capacities, enrollments, and school calendars, and are designed to address any questions pertaining to overcrowding and factors related to school capacity.

Please note the data in these reports already take into account portable classrooms on site, additions being built onto existing schools, student permits and transfers, specific educational programs running at the schools, and any other operational activities or educational programming that affects the capacities and enrollments of LAUSD’s schools. Additions to school capacity data are updated annually and become available first December each year.

Additional information can be found in LAUSD’s 2007 “Strategic Execution Plan” at www.laschools.org/sepl, on LAUSD’s Facilities main webpage at www.laschools.org/, or on LAUSD’s general website, at www.lausd.net.

ATTACHMENTS

1. TWO LAUSD SCHOOLS ENROLLMENTS AND CAPACITIES REPORTS
2. MAP SHOWING SCHOOL ATTENDANCE AREA BOUNDARIES & PROJECT LOCATION
3. BOUNDARY DESCRIPTIONS FOR SCHOOLS SERVING PROPOSED PROJECT
   Attendance area boundary descriptions for existing schools identified as serving the proposed project.

Sincerely,

Rena Perez, Director
### LAUSD SCHOOLS ENROLLMENTS AND CAPACITIES - Report #1

**PROJECT SERVED:** Universal City Vision Plan, 100 Universal City Plaza, Universal City, CA 91608 (See Map).

*(Enrollment & Capacities reflect data from School Year (SY) 2006-2007. SEE DISCLAIMER BELOW.)*

<table>
<thead>
<tr>
<th>Location Code</th>
<th>School Name</th>
<th>Current Calendar</th>
<th>Current Capacity</th>
<th>Resident Enrollment</th>
<th>Actual Enrollment</th>
<th>Current seating capacity</th>
<th>Overcrowded Now?</th>
<th>Overcrowded Capacity</th>
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<th>Projected Overcrowding in Future?</th>
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<td></td>
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</tbody>
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**Schools Planned to Relieve Known Overcrowding:**

**No More Tracks**

**East Valley Area New MS #1**

**12**

**1809**

**DISCLAIMER:** DATA ARE UPDATED ANNUALLY. SY 2007-2008 DATA WILL BECOME AVAILABLE AFTER DECEMBER 1ST 2007.

**NOTES:**

1. School's ID code
2. School's name (High schools listed include enrollments & capacities for all co-located programs at the high school site).
3. The current calendar the school is operating on. Schools operate on a 'multi-track' calendar (listed as 3 TRK or 4 TRK), because of overcrowded conditions.
4. School's current operating capacity, or the maximum number of students the school can serve while operating on its current calendar.
5. The total number of students living in the school's attendance area and who are eligible to attend the school. Includes secondary-grades magnet students.
6. Multi-track calendars are utilized as one method of providing relief to overcrowded schools by increasing enrollment capacities.
7. A key goal of the Superintendent and Board of Education is to return all schools to a traditional 2-semester calendar (1 TRK).
8. The number of students actually attending the school now, including secondary-grades magnet students.
9. Current seating overage (shortage) equal to (current capacity) - (resident enrollment).
10. Current overcrowding status of school. The school is currently overcrowded if any of these conditions exist:
   - School is currently on a multi-track calendar
   - There is currently a seating shortage
   - There is currently a seating overage of LESS THAN or EQUAL TO a 'safety margin' of 30 seats
11. The capacity the school will have after shifting to a 2-semester (1 TRK) calendar and implementing operational goals such as full-day kindergarten and class-size reduction.
12. Projected 5-year total number of students living in the school's attendance area and who are eligible to attend the school. Includes secondary-grades magnet students.
13. Projected seating overage (shortage) equal to (projected capacity) - (projected enrollment).
14. Projected overcrowding status of school. The school will be considered overcrowded in the future if any of these conditions exist:
   - School remains on a multi-track calendar.
   - There is a seating shortage in the future.
   - There is a seating overage of LESS THAN or EQUAL TO a 'safety margin' of 30 seats in the future.
15. The anticipated capacity of new schools planned for the area. While these new seats will help offset projected overcrowding at the existing schools listed in this report, there may be other overcrowded schools not listed here that are also targeted to be relieved by these new schools. Therefore, it should not be assumed that these planned school capacities will be allocated solely towards offsetting overcrowding at the existing schools listed here.
### LAUSD SCHOOLS ENROLLMENTS AND CAPACITIES - Report #2

**PROJECT SERVED:** Universal City Vision Plan, 100 Universal City Plaza, Universal City, CA 91608 (See Map).

(Enrollment & Capacities reflect data from School Year (SY) 2006-2007. SEE DISCLAIMER BELOW.)

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<th>Location Code</th>
<th>School Name</th>
<th>Current Calendar</th>
<th>Current Capacity</th>
<th>Resident Enrollment</th>
<th>Actual Enrollment</th>
<th>Current seating shortage</th>
<th>Overcrowded Now?</th>
<th>Projected Capacity</th>
<th>Projected Enrollments</th>
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<td>(1237)</td>
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</tr>
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</table>

**Schools Planned to Relieve Known Overcrowding:**
- **Central LA Area New HS #1**
- **Hollywood New Continuation HS #1**

**DISCLAIMER:** DATA ARE UPDATED ANNUALLY, SY 2007-2008 DATA WILL BECOME AVAILABLE AFTER DECEMBER 1ST 2007.

NOTES:
1. School's ID code
2. School's name (High schools listed include enrollments & capacities for all co-located programs at the high school site).
3. The current calendar the school is operating on. Schools operate on a 'multi-track' calendar (listed as 3 TRK or 4 TRK), because of overcrowded conditions.
4. School's current operating capacity, or the maximum number of students the school can serve while operating on its current calendar.
5. The total number of students living in the school's attendance area and who are eligible to attend the school. Includes secondary-grades magnet students.
6. Multi-track calendars are utilized as one method of providing relief to overcrowded schools by increasing enrollment capacities.
7. A key goal of the Superintendent and Board of Education is to return all schools to a traditional 2-semester calendar (1 TRK).
8. The number of students actually attending the school now, including secondary-grades magnet students.
9. Current seating shortage: equal to (current capacity) - (resident enrollment).
10. Current overcrowding status of school. The school is currently overcrowded if any of these conditions exist:
   - School is currently on a multi-track calendar
   - There is currently a seating shortage
   - There is currently a seating shortage of LESS THAN a 'safety margin' of 30 seats

The capacity the school will have after shifting to a 2-semester (1 TRK) calendar and implementing operational goals such as full-day kindergarten and class-size reduction.

Projected 5-year total number of students living in the school's attendance area and who are eligible to attend the school. Includes secondary-grades magnet students.

Projected seating shortage: equal to (projected capacity) - (projected enrollment).

Projected overcrowding status of school. The school will be considered overcrowded in the future if any of these conditions exist:
- School remains on a multi-track calendar.
- There is a seating shortage in the future.
- There is a seating shortage of LESS THAN a 'safety margin' of 30 seats in the future.

The anticipated capacity of new schools planned for the area. While these new seats will help offset projected overcrowding at the existing schools listed in this report, there may be other overcrowded schools not listed here that are also targeted to be relieved by these new schools. Therefore, it should not be assumed that these planned school capacities will be allocated solely towards offsetting overcrowding at the existing schools listed here.

* Charter School: Information on the school's current capacity is unavailable.

This correction of the existing boundary description does not change the intent of the boundary as it was approved on July 1, 1996. The description starts at the most northwesterly corner and follows the streets in clockwise order. Boundaries are on the center of the street unless otherwise noted.

This is an official copy for your file.

(GRADES K - 5)

CAMARILLO STREET * LANKERSHIM BOULEVARD * RIVERSIDE DRIVE * CAHUENGA BOULEVARD * MOORPARK STREET * LOS ANGELES UNIFIED SCHOOL DISTRICT BOUNDARY * LOS ANGELES RIVER TO THE EXTENDED TERMINUS OF FORMAN AVENUE * A LINE SOUTHERLY FROM EXTENDED TERMINUS OF FORMAN AVENUE TO CAHUENGA BOULEVARD AT FREDONIA DRIVE * A LINE SOUTHERLY FROM CAHUENGA BOULEVARD AT FREDONIA DRIVE TO MULHOLLAND DRIVE AT FLOYE DRIVE (BOTH SIDES OF MULTIVIEW DRIVE EXCLUDED) * MULHOLLAND DRIVE AT WRIGHTWOOD DRIVE * WRIGHTVIEW PLACE (BOTH SIDES) * A LINE NORTHERLY THROUGH THE INTERSECTIONS OF BERRY DRIVE AND LAURIE PLACE, AND BERRY DRIVE AND LAURIE DRIVE, THEN WEST OF BRILL DRIVE, TO SUNSHINE TERRACE AT TROPICAL DRIVE * TROPICAL DRIVE * VENTURA BOULEVARD * TUJUNGA AVENUE * MOORPARK AVENUE * BECK AVENUE * VENTURA FREEWAY * HOLLYWOOD FREEWAY.

OPTIONAL: RIO VISTA AND CARPENTER AVENUE SCHOOLS

MOORPARK AVENUE * TUJUNGA AVENUE * LOS ANGELES RIVER * BECK AVENUE.

For assistance, please call Demographic and Boundary Unit, Information Technology Division, at (213) 625-5454.

APPROVED: JOHN K. NAGATA, Assistant Superintendent, Information Technology Division

DISTRIBUTION: School
Heritage School
Pupil Statistics
Transportation Branch
Demographic and Boundary Unit
School Traffic and Safety Education Section
Department of Transportation, City of L.A.
SUBJECT: CLARIFICATION OF THE BOUNDARY DESCRIPTION FOR VALLEY VIEW SCHOOL
EFFECTIVE SEPTEMBER 1, 1982 (CLARIFIED 9-20-95).

This clarification of the existing boundary description does not change the
intent of the boundary as it was approved on September 1, 1982.
(Changes have been highlighted by "strikeout" and/or boldface type.) The
description starts at the most northerly corner and follows the streets
in clockwise order. Boundaries are on the center of the street unless
otherwise noted.

This is an official copy for your file.

(Grades K - 6)

LOS ANGELES RIVER * LOS ANGELES UNIFIED SCHOOL DISTRICT
BOUNDARY TO THE EXTENSION OF CALIFORNIA STREET * A LINE
SOUTHERLY THROUGH THE HOLLYWOOD RESERVOIR TO THE
HOLLYWOOD FREEWAY AT PILGRIMAGE BRIDGE VINE STREET *
HOLLYWOOD FREEWAY * A LINE SOUTHWESTERLY, INCLUDING BOTH
SIDES OF MULHOLLAND DRIVE, TO THE INTERSECTION OF CASTILIAN
DRIVE AND SENALDA ROAD * CASTILIAN DRIVE (BOTH SIDES) TO THE
INTERSECTION OF CASTILIAN DRIVE AND OPORTO DRIVE * A LINE
SOUTHWESTERLY, SOUTH OF MALAGA ROAD, THROUGH AND
INCLUDING 2120 OUTPOST DRIVE TO THE EXTENSION OF LA BREA
AVENUE * LA BREA AVENUE EXTENSION EAST OF RUNYON CANYON
ROAD * A LINE WESTERLY SOUTH OF LARMAR ROAD THROUGH AND
INCLUDING 2500 AND 2501 RUNYON CANYON ROAD * A LINE
NORTHWESTERLY TO THE INTERSECTION OF NICHOLS CANYON
ROAD AND LA CUESTA DRIVE * NICHOLS CANYON ROAD * WOODROW
WILSON DRIVE * WESTBROOK AVENUE AND EXTENSION (BOTH SIDES) *
NICHOLS CANYON ROAD (BOTH SIDES) * A LINE WESTERLY,
THROUGH AND INCLUDING 3050 AND 3051 CHANDELLE ROAD AND
NORTH OF BRIAR SUMMIT DRIVE, TO AND INCLUDING 7950
MULHOLLAND DRIVE * MULHOLLAND DRIVE * A LINE NORTHERLY
FROM MULHOLLAND DRIVE AT FLOYE DRIVE TO CAHUENGA
BOULEVARD AT FREDONIA DRIVE, INCLUDING BOTH SIDES OF
MULTIVIEW DRIVE * A LINE NORTHERLY FROM CAHUENGA
BOULEVARD AT FREDONIA DRIVE TO THE LOS ANGELES RIVER AT
THE TERMINUS OF FORMAN AVENUE.

For assistance, please call Demographic and Boundary Unit, Information Technology Division,
at (213) 625-6181.

APPROVED: JOHN K. NAGATA, Assistant Superintendent, Information Technology Division

DISTRIBUTION: School
Heritage School
Pupil Statistics
Transportation Branch

Demographic and Boundary Unit
School Traffic and Safety Education Section
Department of Transportation, City of L. A.

Reconfiguration has changed the grade levels serviced by this school and the boundary description has been updated to reflect this change. This updating does not change the intent of the boundary as it was approved on September 1, 1981 (updated 7-1-1994, 7-1-1997, 7-1-2004; clarified 10-7-1996). The description starts at the most northwesterly corner and follows the streets in clockwise order. Boundaries are on the center of the street unless otherwise noted.

This is an official copy for your file.

(GRADE 6)

AREA I

MULHOLLAND DRIVE * LAUREL CANYON BOULEVARD (BOTH SIDES EXCLUDED, INCLUDING LAUREL CANYON PLACE, AMOR ROAD, CORNETT DRIVE, AND ERLITA DRIVE) TO THE INTERSECTION OF ERLITA DRIVE AND LAUREL CANYON BOULEVARD * LAUREL CANYON BOULEVARD TO WILLOW GLEN ROAD * A LINE EASTERNLY AND NORTHERLY FROM LAUREL CANYON BOULEVARD AT WILLOW GLEN ROAD (EXCLUDING WILLOW GLEN ROAD, THAMES STREET, AND LEICESTER DRIVE) TO WALK THROUGH BETWEEN WOODSTOCK ROAD AND MOUNT OLYMPUS DRIVE * A LINE SOUTHERLY FROM WALK THROUGH AT WOODSTOCK ROAD AND MOUNT OLYMPUS DRIVE INCLUDING JOVENITA CANYON DRIVE, TO AND INCLUDING 8101 LAURELMONT DRIVE * A LINE SOUTHEASTERLY FROM AND INCLUDING 8100 LAURELMONT DRIVE, EAST OF LAUREL CANYON BOULEVARD AND ITS TRIBUTARY STREETS, TO THE INTERSECTION OF LAUREL CANYON BOULEVARD AND HONEY DRIVE * LAUREL CANYON BOULEVARD * A LINE SOUTHWESTERLY FROM THE INTERSECTION OF LAUREL CANYON BOULEVARD AND GOULD AVENUE, EXCLUDING CRESCENT HEIGHTS BOULEVARD, TO THE INTERSECTION OF YUCCA TRAIL AND GRAND VIEW DRIVE * GRAND VIEW DRIVE (BOTH SIDES) * MAGNOLIA DRIVE (BOTH SIDES) * COLE CREST DRIVE (BOTH SIDES) * McLEOD DRIVE (BOTH SIDES EXCLUDED) * SUNSET PLAZA DRIVE (BOTH SIDES) * CRESCENT DRIVE (BOTH SIDES) EXTENDED WESTERLY TO THE LOS ANGELES UNIFIED SCHOOL DISTRICT BOUNDARY * LOS ANGELES UNIFIED SCHOOL DISTRICT BOUNDARY * A LINE NORTHERLY, EAST OF MEREDITH PLACE, ALTO CEDRO DRIVE, BRIARCREST ROAD, AND BRIARCREST LANE TO AND EXCLUDING 8600 MULHOLLAND DRIVE.

AREA II

SUNSET BOULEVARD * HAVENHURST DRIVE * FOUNTAIN AVENUE * ORANGE GROVE AVENUE * SANTA MONICA BOULEVARD * LA BREA AVENUE * FOUNTAIN AVENUE * VINE STREET * ROSSMORE AVENUE * ROSEWOOD AVENUE AND EXTENSION * OAKWOOD AVENUE AND EXTENSION * ORLANDO AVENUE * ROSEWOOD AVENUE * LA CIENEGA BOULEVARD * MELROSE AVENUE * SAN VICENTE BOULEVARD (BOTH SIDES EXCLUDED) * SANTA MONICA BOULEVARD * OLIVE DRIVE.
MULHOLLAND DRIVE * LAUREL CANYON BOULEVARD (BOTH SIDES EXCLUDED, INCLUDING LAUREL CANYON PLACE, AMOR ROAD, CORNETT DRIVE AND ELRITA DRIVE) TO THE INTERSECTION OF ELRITA DRIVE AND LAUREL CANYON BOULEVARD * LAUREL CANYON BOULEVARD TO WILLOW GLEN ROAD * A LINE EASTERLY AND NORTHERLY FROM LAUREL CANYON BOULEVARD AT WILLOW GLEN ROAD (EXCLUDING WILLOW GLEN ROAD, THAMES STREET, AND LEICESTER DRIVE) TO WALK THROUGH BETWEEN WOODSTOCK ROAD AND MOUNT OLYMPUS DRIVE * WOODSTOCK ROAD (BOTH SIDES EXCLUDED) TO THE INTERSECTION OF WOODSTOCK ROAD AND WILLOW GLEN ROAD * A LINE NORTHERLY, EXCLUDING BOTH SIDES OF WOODSTOCK ROAD, ADA STREET, AND CARDWELL PLACE, THROUGH AND EXCLUDING 7800 AND 7801 WOODROW WILSON DRIVE * A LINE EASTERLY INCLUDING BOTH SIDES OF WOODROW WILSON DRIVE AND ITS CONTRIBUTING STREETS * NICHOLS CANYON ROAD (BOTH SIDES) * A LINE WESTERLY THROUGH AND INCLUDING 3050 AND 3051 CHANDELLE ROAD AND NORTH OF BRIAR SUMMIT DRIVE TO AND INCLUDING 7950 MULHOLLAND DRIVE * MULHOLLAND DRIVE * A LINE FROM MULHOLLAND DRIVE AT FLOYE DRIVE TO CAHUENGA BOULEVARD AT FREDONIA DRIVE, INCLUDING BOTH SIDES OF MULTIVIEW DRIVE * A LINE FROM CAHUENGA BOULEVARD AT FREDONIA DRIVE TO THE LOS ANGELES RIVER AT TERMINUS OF FORMAN AVENUE * LOS ANGELES RIVER * LOS ANGELES UNIFIED SCHOOL DISTRICT BOUNDARY TO TERMINUS OF CALIFORNIA STREET * A LINE SOUTHERLY THROUGH THE HOLLYWOOD RESERVOIR TO HOLLYWOOD FREeway AT VINE STREET * HOLLYWOOD FREeway * CAHUENGA BOULEVARD * HOLLYWOOD BOULEVARD * VINE STREET * ROSSMORE AVENUE * ROSEWOOD AVENUE AND EXTENSION * OAKWOOD AVENUE AND EXTENSION * ORLANDO AVENUE * ROSEWOOD AVENUE * LA CIENEGA BOULEVARD * MELROSE AVENUE * LOS ANGELES UNIFIED SCHOOL DISTRICT BOUNDARY * A LINE NORTHERLY, EAST OF MEREDITH PLACE, ALTO CEDRO DRIVE, BRIARCREST ROAD AND BRIARCREST LANE TO AND EXCLUDING 8600 MULHOLLAND DRIVE.

For assistance, please call Master Planning & Demographics, Facilities Services Division, at (213) 633-7606.

APPROVED: JAMES A. McCONNELL, Jr., Chief Facilities Executive, Facilities Services Division

DISTRIBUTION: 
- School
- Pupil Statistics
- Transportation Branch
- Master Planning and Demographics
- School Traffic and Safety Education Section
- Department of Transportation, City of L. A.
This clarification of the existing boundary description does not change the intent of the boundary as it was approved on July 1, 1993 (updated 7-1-96). (Changes have been highlighted by "strikeout" and/or boldface type.) The description starts at the most northwesterly corner and follows the streets in clockwise order. Boundaries are on the center of the street unless otherwise noted.

This is an official copy for your file.

(Grades 6 - 8)

Oxnard Street * Los Angeles Unified School District Boundary * Los Angeles River * A line extended southwesterly from Los Angeles River at Forman Avenue to the intersection of Cahuenga Boulevard and Fredonia Drive * A line extended southerly, west of Multiview Drive, to Mulholland Drive at Floye Drive * Mulholland Drive to and excluding 7950 Mulholland Drive * A line easterly, north of Briar Summit Drive and south of Chandelier Place, through and excluding 3050 and 3051 Chandelier Road * Nichols Canyon Road (both sides excluded) * Woodrow Wilson Drive and contributing streets (both sides excluded) through and including 7800 and 7801 Woodrow Wilson Drive * A line southwesterly, including both sides of Cardwell Place, Ada Street, and Woodstock Road to the intersection of Woodstock Road and Willow Glen Road * Woodstock Road (both sides) to the intersection of Woodstock Road and Mount Olympus Drive * A line southwesterly from Woodstock Road at Mount Olympus Drive (including both sides of Willow Glen Road, Leicester Drive, and Thames Street) to the intersection of Willow Glen Road and Laurel Canyon Boulevard * Laurel Canyon Boulevard to Elrita Drive * Laurel Canyon Boulevard (both sides, including Elrita Drive, Cornett Drive, Amor Road and Laurel Canyon Place) to the intersection of Laurel Canyon Boulevard and Mulholland Drive * Mulholland Drive to the intersection of Mulholland Drive and Coldwater Canyon Avenue * A line northerly to the terminus of Goodland Avenue * A line northerly to the intersection of Whitsett Avenue and Laurel Terrace Drive (excluding both sides of Sunswept Drive and Vanetta Drive) * Whitsett Avenue * Burbank Boulevard * Laurel Canyon Boulevard.

For assistance, please call Demographic and Boundary Unit, Information Technology Division, at (213) 625-5454.

APPROVED: JOHN K. NAGATA, Assistant Superintendent, Information Technology Division

DISTRIBUTION: School
Heritage School
Pupil Statistics
Transportation Branch

Demographic and Boundary Unit
School Traffic and Safety Education Section
Department of Transportation, City of L. A.
SUBJECT: CLARIFICATION OF THE BOUNDARY DESCRIPTION FOR HOLLYWOOD SENIOR HIGH SCHOOL EFFECTIVE SEPTEMBER 1, 1982 (CLARIFIED 10-7-96; 6-27-05).

This clarification of the existing boundary description does not change the intent of the boundary as it was approved on September 1, 1982 (clarified 10-7-96). (Changes have been highlighted by "strikeout" and/or boldface type.) The description starts at the most northwesterly corner and follows the streets in clockwise order. Boundaries are on the center of the street unless otherwise noted.

This is an official copy for your file.

(GRADES 9 - 12)

A LINE FROM MULHOLLAND DRIVE AND FLOYE DRIVE WEST OF MULTIVIEW DRIVE THROUGH THE INTERSECTION OF FREDONIA DRIVE AND CAHUENGA BOULEVARD TO THE LOS ANGELES RIVER AT FORMAN AVENUE * LOS ANGELES RIVER * LOS ANGELES UNIFIED SCHOOL DISTRICT BOUNDARY * RIVERSIDE DRIVE TO ZOO DRIVE * A LINE SOUTHERLY FROM RIVERSIDE DRIVE AT ZOO DRIVE TO VERMONT AVENUE AT THE SOUTH BOUNDARY OF GRIFFITH PARK * GRIFFITH PARK BOUNDARY * FERN DELL DRIVE (BOTH SIDES) * LOS FELIZ BOULEVARD TO LAUGHLIN PARK DRIVE * LOS FELIZ BOULEVARD (BOTH SIDES EXCLUDED) * DE MILLE DRIVE (BOTH SIDES EXCLUDED) * KINGSLEY DRIVE AND EXTENSION * HOLLYWOOD BOULEVARD * NORMANDIE AVENUE * SUNSET BOULEVARD * EDGEMONT STREET * MONROE STREET * ALEXANDRIA AVENUE * MONROE STREET AND EXTENSION EXCLUDING 773 NORTH ALEXANDRIA AVENUE AND 826 NORTH MARIPOSA AVENUE * NORMANDIE AVENUE * MELROSE AVENUE * VAN NESS AVENUE * SANTA MONICA BOULEVARD * GREENACRE AVENUE * FOUNTAIN AVENUE * FULLER AVENUE * SUNSET BOULEVARD * VISTA STREET * HAWTHORN AVENUE * VISTA STREET * RUNYAN CANYON ROAD * MULHOLLAND DRIVE.

OPTIONAL: HOLLYWOOD AND FAIRFAX SENIOR HIGH SCHOOLS

MULHOLLAND DRIVE * LAUREL CANYON BOULEVARD (BOTH SIDES EXCLUDED, INCLUDING LAUREL CANYON PLACE, AMOR ROAD, CORNETT DRIVE, AND ELRITA DRIVE) TO THE INTERSECTION OF ELRITA DRIVE AND LAUREL CANYON BOULEVARD * LAUREL CANYON BOULEVARD TO WILLOW GLEN ROAD * A LINE EASTERLY AND NORTHERLY FROM LAUREL CANYON BOULEVARD AT WILLOW GLEN ROAD (EXCLUDING WILLOW GLEN ROAD, THAMES STREET, AND LEICESTER DRIVE) TO THE INTERSECTION OF WOODSTOCK ROAD AND MOUNT OLYMPUS DRIVE * WOODSTOCK ROAD (BOTH SIDES EXCLUDED) TO THE INTERSECTION OF WOODSTOCK ROAD AND WILLOW GLEN ROAD * A LINE NORTHERLY, EXCLUDING BOTH SIDES OF WOODSTOCK ROAD, ADA STREET, AND CARDWELL PLACE, TO AND EXCLUDING 7800 AND 7801 WOODROW WILSON DRIVE * A LINE EASTERLY.
INCLUDING BOTH SIDES OF WOODROW WILSON DRIVE AND ITS CONTRIBUTING STREETS * NICHOLS CANYON ROAD (BOTH SIDES) * A LINE WESTERLY THROUGH AND INCLUDING 3050 AND 3051 CHANDELLE ROAD AND NORTH OF BRIAR SUMMIT DRIVE TO AND INCLUDING 7950 MULHOLLAND DRIVE * MULHOLLAND DRIVE * RUNYAN CANYON ROAD * VISTA STREET * HAWTHORN AVENUE * VISTA STREET * SUNSET BOULEVARD * LOS ANGELES UNIFIED SCHOOL DISTRICT BOUNDARY * A LINE NORTHERLY EAST OF MEREDITH PLACE ALTO CEDRO DRIVE, ALTO CEDRO DRIVE BRIARCREST LANE, BRIARCREST ROAD AND BRIARCREST LANE-MEREDITH PLACE TO AND EXCLUDING 8600 MULHOLLAND DRIVE.

For assistance, please call Master Planning & Demographics, Facilities Services Division, at (213) 633-7606.

APPROVED: JAMES A. McCONNELL, Jr., Chief Facilities Executive, Facilities Services Division

DISTRIBUTION: School Master Planning and Demographics
Pupil Statistics School Traffic and Safety Education Section
Transportation Branch Department of Transportation, City of L. A.
SUBJECT: NEW SERVICE BOUNDARY DESCRIPTION FOR EAST VALLEY AREA NEW HIGH SCHOOL No. 1B, EFFECTIVE JULY 1, 2006.

The area described below has been approved by the superintendent as the attendance area served by the above-mentioned school. The description starts at the most northwesterly corner and follows the streets in clockwise order. Boundaries are on the center of the street unless otherwise noted.

This boundary supersedes boundary effective (New School).

This is an official copy for your file.

(GRADES 9 - 10)

VALERIO STREET * LOS ANGELES UNIFIED SCHOOL DISTRICT BOUNDARY * LOS ANGELES RIVER * A LINE EXTENDED SOUTHWESTERLY FROM LOS ANGELES RIVER AT FORMAN AVENUE TO HOLLYWOOD FREEWAY * HOLLYWOOD FREEWAY * LANKERSHIM BOULEVARD * TUJUNGA AVENUE * ERWIN STREET * FAIR AVENUE AND EXTENSION.

For assistance, please call Master Planning & Demographics, Facilities Services Division, at (213) 893-6850.

APPROVED: JOSEPH A. MEHULA, Chief Facilities Executive, Facilities Services Division

DISTRIBUTION: School Master Planning and Demographics
Pupil Statistics School Traffic and Safety Education Section
Transportation Branch Department of Transportation, City of L. A.
Response to Comment No. 12-369

Appendix W consists of a letter submitted by the Los Angeles Unified School District to the City of Los Angeles Planning Department, with notations added by the commenter regarding the use of tracts and year-round schools, and is referenced in Comment No. 12-31. As such, the commenter is referred to Response to Comment No. 12-31, above.

Comment No. 12-370

See next page
Playa Vista EIR included a mitigation measure required by LAUSD, based on the size of the original project, to set aside a 4.0 acre site for a school.

LAUSD constructed the school after the $20 billion school construction bond was passed by the voters.

Hope that answers your question.

On Mon, Jan 17, 2011 at 4:38 PM, Lisa Sarkin <Isarkin@scnc.info> wrote:

H Renee - Hope you had a nice day off.

Are you able to get the following information for us - we heard that at Playa Vista the developer was required to build at least one school? If that is true, can you supply us with something written. We can find it no matter what we research.

Thanks so much,

Lisa Sarkin
Studio City Neighborhood Council Board Member
Chair - Land Use Committee
SCNC (818) 655-5400 home office (818) 980-1010
fax (818) 980-1011 cell (818) 439-1674

Attachments:
untitled-[1]
Size: 0.8 k
Type: text/plain
Response to Comment No. 12-370

Appendix W1 is a copy of an email from Renee Weitzer, Chief of Staff for Councilmember Tom LaBonge to Isarkin@scnc.com and is referenced in Comment No. 12-31. As such, the commenter is referred to Response to Comment No. 12-31, above.

Comment No. 12-371

See next page

**APPLICATION TYPE** GENERAL PLAN AMENDMENT/DESIGNATION (INCLUDING ESTABLISHMENT OF UNIVERSAL CITY SPECIFIC PLAN); SPECIFIC PLAN AMENDMENT TO MULHOLLAND SCENIC PARKWAY SPECIFIC PLAN; ZONE CHANGE/DESIGNATION AND CODE AMENDMENT; DEVELOPMENT AGREEMENT AND PRE-ANNEXATION AGREEMENT (zone change, variance, conditional use, tract/parcel map, specific plan exception, etc.)

**1. PROJECT LOCATION AND SIZE**

<table>
<thead>
<tr>
<th>Street Address of Project</th>
<th>Zip Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>100 Universal City Plaza, Universal City, CA</td>
<td>91608</td>
</tr>
</tbody>
</table>

Legal Description: Lot SEE ATTACHMENT A Block Tract

<table>
<thead>
<tr>
<th>Lot Dimensions</th>
<th>Lot Area (sq. ft.)</th>
<th>Total Project Size (sq. ft.)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**2. PROJECT DESCRIPTION**

Describe what is to be done: SEE ATTACHMENT B.

Present Use: [ ] New Construction  [ ] Change of Use  [ ] Alterations  [ ] Demolition

Plan Check No. (if available) Date Filed:

Check all that apply:  [X] Commercial  [X] Industrial  [X] Residential  [ ] LEED Silver

Additions to the building:  [ ] Rear  [ ] Front  [ ] Height  [ ] Side Yard

No. of residential units: Existing [ ] To be demolished [ ] Adding [ ] Total [ ]

**3. ACTION(S) REQUESTED**

Describe the requested entitlement which either authorizes actions OR grants a variance:

<table>
<thead>
<tr>
<th>Code Section from which relief is requested:</th>
<th>Code Section which authorizes relief:</th>
</tr>
</thead>
<tbody>
<tr>
<td>SEE ATTACHMENT B.</td>
<td></td>
</tr>
</tbody>
</table>

List related or pending case numbers relating to this site:

Tentative Tract Map Nos. 068564, 068566 and 069527 are being filed concurrently.
Project Location

The NBC Universal Evolution Plan property comprises approximately 391 acres (the "Project Site"), with approximately 95 acres located within the City of Los Angeles, and 296 acres in the unincorporated area of Los Angeles County. The Project Site is generally bounded by the Los Angeles River Flood Control Channel to the north, the Hollywood Freeway to the south (except for the southwest corner of the Project Site which abuts hotel and office towers), Barham Boulevard to the east (except in the area of the Hollywood Manor residential area), and Lankershim Boulevard and the Universal City Metro Red Line Station to the west. The Project Site has been extensively developed over the past 90 years, although the eastern area (the "Back Lot") is currently underdeveloped.

Currently, the portion of the Project Site within City jurisdiction involves several non-contiguous areas surrounding the County portion. The three primary areas of the Project Site currently within City jurisdiction, proceeding clockwise from the northeast, are: (1) approximately 40 acres at the northeastern corner of the Project Site along Barham Boulevard; (2) approximately 11 acres at the southeastern corner of the Project Site along Barham Boulevard and Buddy Holly Drive; and (3) approximately 40 acres along the southern and southwestern portion of the Project Site, adjacent to the Hollywood Freeway and hotel and office towers, which also includes Universal Hollywood Drive and a limited amount of frontage along the north side of Universal Hollywood Drive. The portion of the Project Site currently within County jurisdiction is a contiguous area encompassing most of the northern, central and western portions of the Project Site.

Requested Actions

The Applicant seeks the following discretionary actions from the City of Los Angeles:

- General Plan Amendment/Designation to Regional Commercial and adding Universal City Specific Plan (UCSP) as a corresponding zone;
- Zone Change/Designation to Universal City Specific Plan (UCSP) and Code Amendment to add the Universal City Specific Plan (UCSP) zone;
- Establishment of the Universal City Specific Plan;
- Tentative Tract Maps for mixed-use development (residential and limited neighborhood commercial serving the residential development), including a range of residential types, small-lot subdivision and air space lots (with accompanying Design Guidelines), as well as production-related facilities and studio office uses in the western portion of the Project Site. The Tract Maps will include haul route permit and protected tree removal approvals;
- Development Agreement and Pre-Annexation Agreement;
- Establishment of Community Facilities/Mello-Roos Districts (acquisition and construction).
Response to Comment No. 12-371

Appendix X consists of a copy of a portion of the City Master Land Use Permit Application for the proposed Project and is referenced in Comment No. 12-32. As such, the commenter is referred to Response to Comment No. 12-32, above.

Comment No. 12-372

See next page
VENTURA-CAHUENGA BOULEVARD CORRIDOR

Specific Plan

Ordinance No. 166,560
Effective February 16, 1991

Amended by Ordinance No. 171,240
Effective September 25, 1996

Amended by Ordinance No. 174,052
Effective August 18, 2001

Specific Plan Procedures
Amended by Ordinance No. 173,455

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Section 6. Building Limitations

Section 7. Land Use Regulations

Section 8. Sign Regulations

Section 9. Project Permit Compliance

Section 10. Transportation Mitigation Standards and Procedures

Section 11. Project Impact Assessment Fee

Section 12. PIA Fee-Funded Improvements and Services

Section 13. Prior Projects Permitted

Section 14. Public Right-Of-Way Improvements

Section 15. Plan Review

Section 16. Alley Vacations

Section 17. Owners Acknowledgment of Limitations

Section 18. Severability

Section 19. Specific Plan Exceptions Exemption

Section 20. Repeal of Existing Ventura/Cahuenga Corridor Specific Plan Ordinance

A Part of the General Plan - City of Los Angeles
www.lacity.org/Plan (General Plans)
VENTURA-CAHUENGA BOULEVARD CORRIDOR SPECIFIC PLAN

An ordinance amending the Ventura-Cahuenga Boulevard Corridor Specific Plan, for portions of the Sherman-Oaks-Studio City/Cahuenga Pass-Toluca Lake District Plan, the Encino-Tarzana District Plan, and the Canoga Park-Winnetka-Woodland Hills-West Hills District Plan.

WHEREAS, the Ventura/Cahuenga Boulevard Corridor Specific Plan is nine years old; and

WHEREAS, the policy language needs to be clarified and procedural changes necessitated by the new Charter require an amendment to effect those policies; and

WHEREAS, the Ventura-Cahuenga Boulevard Corridor is still experiencing serious traffic, transportation and density problems, which in a number of locations are classified as unacceptable, and after the slow pace of development during the recent recession, new development in the Corridor once again is developing beyond the capacity of the transportation infrastructure; and

WHEREAS, the amendments; expansion of pedestrian oriented areas; and designation of the Regionally Impacted Area, Pedestrian Development District and Restricted Use Area address the increase in traffic generated by increased development by encouraging pedestrian activity and minimizing multiple automobile trips; and

WHEREAS, historical approaches to building and financing transportation capital improvements no longer appear sufficient to meet the needs of the corridor. As a result new approaches, including restrictions on future developments, must be devised to ensure that Ventura Boulevard remains viable as the San Fernando Valley's premier commercial corridor; and

WHEREAS, the adoption and implementation of community streetscape plans will contribute to improving streetscape amenities as well as enhance the aesthetic atmosphere along the Ventura/Cahuenga Corridor while creating individual and distinct identities for the five communities within the Corridor; and

NOW THEREFORE,

THE PEOPLE OF THE CITY OF LOS ANGELES DO ORDAIN AS FOLLOWS:

ESTABLISHMENT OF SPECIFIC PLAN

A. The Council hereby establishes the Ventura-Cahuenga Boulevard Corridor Specific Plan. The Corridor extends from Dry Canyon-Calabasas Flood Control Channel west of Woodlake Avenue to Woodrow Wilson Drive on the east as shown in Map 1. The Specific
Plan is applicable to that area of the City of Los Angeles that are highlighted on Maps 1 through 14.

B. As shown in Maps 1 through 14, the Ventura-Cahuenga Boulevard Corridor Specific Plan is divided into five major communities: (1) the Studio City/Cahuenga Pass Community (west of Woodrow Wilson Drive to Fulton Avenue), (2) the Sherman Oaks Community (Fulton Avenue to the San Diego Freeway), (3) the Encino Community (San Diego Freeway to Lindley Avenue), (4) the Tarzana Community (Lindley Avenue to Corbin Avenue), and (5) the Woodland Hills Community (Corbin Avenue to Dry Canyon-Calabasas Flood Control Channel, west of Woodlake Avenue).

C. The Pedestrian Oriented Areas (POA) within each of the five major communities are indicated on Exhibits A through G.

D. As shown in Maps 1 through 14, the Ventura-Cahuenga Boulevard Corridor Specific Plan utilizes three plan designations: (1) Regional Commercial; (2) Community Commercial, and (3) Neighborhood and General Commercial.

Section 2.

PURPOSES

The purposes of this Specific Plan are as follows:

A. To assure that an equilibrium is maintained between the transportation infrastructure and land use development in the Corridor and within each separate community of the Ventura-Cahuenga Boulevard Corridor Specific Plan area.

B. To provide for an effective local circulation system of streets and alleys which is minimally impacted by the regional circulation system and reduces conflicts among motorists, pedestrians, and transit riders.

C. To provide building and site design guidelines to promote attractive and harmonious multi-family and commercial development.

D. To assure a balance of commercial land uses in the Specific Plan area that will address the needs of the surrounding communities and greater regional area.

E. To provide a compatible and harmonious relationship between residential and commercial development where commercial areas are contiguous to residential neighborhoods.

F. To preserve and enhance community aesthetics by establishing coordinated and comprehensive standards for signs, buffering, setbacks, lot coverage, and landscaping.

G. To enhance the plan area landscaping by providing guidelines and a process for a coordinated landscaping program of public and private property for the Specific Plan's communities.
Section 3.

H. To promote an attractive pedestrian environment which will encourage pedestrian activity and reduce traffic congestion.

I. To promote and enhance the distinct character of each of the five Specific Plan communities by establishing design guidelines and community development limitations.

J. To establish guidelines and a process for implementing Charter required amendments, regulatory controls, providing incentives, and funding mechanisms, and enforcement for the systematic execution of the policies and goals of the General Plan within the Specific Plan area.

K. To promote a high level of pedestrian activity in the Pedestrian Oriented Areas by regulating the placement of buildings and structures to accommodate outdoor dining and other ground level retail activity, as well as provide for attractive landscaping.

L. To provide community development limitations based on the community infrastructure’s transportation capacity.

M. To preserve alleys, wherever possible, in the corridor to facilitate traffic flow.

N. To enhance Community Streetscape Plans by encouraging the undergrounding of utilities.

RELATIONSHIP TO OTHER PROVISIONS OF THE LOS ANGELES MUNICIPAL CODE


1. The regulations of the Specific Plan are in addition to those set forth in the planning and zoning provisions of Los Angeles Municipal Code (LAMC) Chapter I, as amended, and any other relevant ordinances and do not convey any rights not otherwise granted under the provisions and procedures contained in that chapter and other relevant ordinances, except as specifically provided here.

2. Wherever this Specific Plan contains provisions which require different setbacks, restricted yards, lower densities, lower heights, restricted uses, greater parking requirements or other greater restrictions or limitations on development than would be allowed pursuant to the provisions contained in LAMC Chapter I, the Specific Plan shall prevail and supersede the applicable provisions of that Code.

B. Procedures For Various Approval Related To The This Specific Plan. The procedures for the granting of an exception, Project Permit Compliance, Appeal, Modification of Permit Compliance, Project Permit Adjustment to and Interpretation of this Specific Plan are set forth in LAMC Section 11.5.7. In approving an exception to this
Specific Plan, pursuant to Section 11.5.7 F, the Area Planning Commission, and the City Council on appeal, may simultaneously approve any conditional use under their jurisdiction. Only one fee shall be required for joint applications.

DEFINITIONS

The following words or phrases, whenever used in this Specific Plan, shall be construed as defined in this Section. Words and phrases not defined herein shall be construed as defined in LAMC Sections 12.03, 91.0402 through 91.0423 and 91.6203.

A.M. PEAK HOUR: The one hour period of a weekday with the greatest average on-street traffic volume occurring during the hours of 7:00 A.M. to 10:00 P.M.

APPLICANT: Any person, as defined in LAMC Section 11.01, submitting an application for a building permit, demolition permit, excavation permit, foundation permit, grading permit or sign permit for a Project.

ASSESSMENT DISTRICT: For the purposes of this Specific Plan Ordinance, an area established within the boundaries of this Specific Plan by the City Council for the purpose of levying assessments on property owners within the area to fund certain improvements and activities as identified within this Specific Plan.

AUTO-RELATED USES: Auto-related uses for the purposes of this Specific Plan shall be defined as car washes, motor and/or recreational vehicle sales and/or rentals, maintenance, repair and accessory installation.

CITY BUILDING COST INDEX: An index for tracking the rate of inflation in building costs. For the purposes of this Specific Plan, that component of the index for the Los Angeles Metropolitan Area, published by Marshall and Swift relative to "metal frame and walls" will be used to define the City Building Cost Index. If for any reason, this Index ceases to be published, then a similar building cost index will be utilized.

COMMERCIAL FLOOR AREA: Floor area devoted to non-residential uses. Hotels and motels shall not be considered residential uses for purposes of this definition.

COMMUNITY COMMERCIAL PLAN DESIGNATION: A land use designation in the Community Plan which is a focal point for surrounding residential neighborhoods and containing a diversity of uses, such as small offices and overnight accommodations, cultural facilities, schools and libraries, in addition to neighborhood oriented services.

COMMUNITY PLAN(S): The adopted Community Plans for the Sherman Oaks-Studio City/Cahuenga Pass-Toluca Lake-Cahuenga Pass Community Plan area, the Encino-Tarzana Community Plan area, and the Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan area, which plans include all portions of the Ventura/Cahuenga Boulevard Corridor Specific Plan.
CONVENIENCE MARKET: A retail market, which has a floor area of less than 5,000 square feet and which sells an assortment of packaged food and small, non-food carry-out items.

COURT/COURTYARD: A space, open to the sky, located within three feet above or below curb level on a lot and bounded on three or more sides by walls of a building.

DRIVE-THROUGH CONVENIENCE PREMIUM: The fixed component of the Project Impact Assessment (PIA) Fee charged when Drive-Through Establishments are included in retail sales/service, restaurant, and bank use regardless of the number of ATM, teller, and service windows; and for gasoline stations regardless of the number of fueling positions. Convenience Markets are always charged this Drive-Through/Convenience Premium.

DRIVE-THROUGH ESTABLISHMENT: Any establishment which dispenses food or services for consumption or use on or off the premises to an individual in a vehicle. These establishments may include, but are not limited to, restaurants, pharmacies, banks, and dry cleaners.

FLOOR AREA RATIO: A multiplier applied to the buildable area of a commercially or residentially zoned lot in order to determine the maximum allowable floor area of all buildings on a lot. The ratio is a calculation of the maximum allowable buildable floor area of all buildings to the total square footage of the lot.

FRONT YARD: The Front Yard shall be defined as the area of the lot facing Ventura or Cahuenga Boulevard between the front lot line and those portions of the building at ground level, exclusive of over-hangs or extensions. Where there is no established building line on Ventura or Cahuenga Boulevard, then the lot line contiguous with Sepulveda, Van Nuys, Reseda or Laurel Canyon Boulevards shall be deemed the front lot line.

GROUND FLOOR: The lowest story within a building that is accessible to the street, the floor level of which is within three feet above or below curb level, the frontage of which is on or is primarily facing any public street, and the depth of which is at least 50 feet or the total depth of the building, whichever is less.

IN LIEU CREDIT: A credit toward payment of the Project Impact Assessment Fee, pursuant to the provisions of Section 11 of this Specific Plan.

INTERIM CONTROL ORDINANCE (ICO) PROJECTS: Projects for which a covenant and agreement was recorded pursuant to the Ventura/Cahuenga Boulevard Interim Control Ordinance or preceding ordinances (Ordinance Nos. 165,290, 162,907, 160,406, 160,514 and 166,313).

LEVEL OF SERVICE (LOS): An indicator, designated "A" through "F," of the degree of traffic saturation of a lane segment or intersection. For purposes of this Specific Plan, "LOS" pertains to Level of Service at intersections, which is determined by the ratio of critical lane volume "V" to the intersection's capacity "C" or "V/C" ratio.
RESTRICTED USE AREA: The area identified on Map 2B bounded by both sides of Van Nuys Boulevard between Moorpark Street on the south and the Ventura (101) Freeway on the north.

SANDWICH SIGN: A portable sign consisting of two sign faces which connect at the top and extend outward at the bottom.

SHOPPING CENTER: A building or group of buildings on a lot or lots with 10,000 or more square feet of commercial retail uses and with more than one commercial retail use.

STRETCHERS: Replacement or enhancement of signs that exceed height and/or area of initially permitted sign face by the Department of Building and Safety.

SUPERGRAPHIC DISPLAY: A sign, consisting of an image projected onto a wall or printed on vinyl, mesh or other material with or without written text, supported and attached, to a wall by an adhesive and/or by using stranded cable and eye-bolts and/or other materials or methods, that does not comply with the provisions in LAMC Section 91.62.01, et seq., relating to Wall Signs, Mural Signs, Off-Site Signs and Temporary Signs.

SUPERMARKET: A retail store with a floor area equal to or greater than 5,000 square feet, which sells an assortment of foods, as well as items for food preparation, household cleaning, and personal care.

TAKE-OUT FOOD ESTABLISHMENT: An establishment dispensing food for off-site consumption that has the following characteristics: (1) contains the space capacity to provide for no more than five seats; (2) provides no table orders or waiter-service; (3) provides no utensils, beverage, condiment, or other foodstuffs, except expressly as part of any order dispensed for off-site consumption; and (4) dispenses all food in disposable containers and/or wrapping.

TRAFFIC ASSESSMENT: The Department of Transportation’s written determination of the likely traffic impacts resulting from the Project and its mitigation measures, considering the estimate of Project-generated trips, ambient growth, related developments, and levels of service at adjacent intersections.

TRAFFIC STUDY: A written report prepared at the Applicant's expense and submitted by the Applicant according to DOT's Traffic Study guidelines, discussing the traffic engineering investigation and analysis of Project-related traffic impacts, including recommendations to mitigate the traffic impacts, if any.

TRANSPORTATION DEMAND MANAGEMENT (TDM): A program promoting ridesharing and transit use to reduce Project-related Trips, to be provided by an Applicant or owner, lessee or assignee of an Applicant.

TRIP: An arrival at or a departure from a Project during the A.M. or P.M. peak hours by a motor vehicle as calculated by the Department of Transportation using the Trip generation formulas and/or table provided in technical references published by the Institute of Transportation Engineers.
Phase I - 23,400,000 square feet;
Phase II - 27,898,000 square feet.

D. Project Limitations Based On Commercial Floor Area For Phase
I and Phase II. In Phase I, no Project shall be permitted which would
result in creating more than the cumulative total Commercial Floor
Area in any community that exceeds the following limits:

ADDITIONAL FLOOR AREA ALLOCATIONS FOR EACH COMMUNITY
AND CUMULATIVE TOTALS FOR EACH PHASE OF DEVELOPMENT

<table>
<thead>
<tr>
<th>COMMUNITY</th>
<th>PHASE I ADDITIONAL FLOOR AREA (SF)</th>
<th>PHASE II ADDITIONAL FLOOR AREA (SF)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Studio City/Cahuenga Pass</td>
<td>728,351</td>
<td>797,185</td>
</tr>
<tr>
<td>Sherman Oaks</td>
<td>398,670</td>
<td>436,323</td>
</tr>
<tr>
<td>Encino</td>
<td>614,445</td>
<td>672,395</td>
</tr>
<tr>
<td>Tarzana</td>
<td>665,526</td>
<td>728,183</td>
</tr>
<tr>
<td>Woodland Hills</td>
<td>1,703,008</td>
<td>1,863,914</td>
</tr>
<tr>
<td><strong>Subtotals:</strong></td>
<td><strong>4,110,000</strong></td>
<td><strong>4,498,000</strong></td>
</tr>
<tr>
<td>Base Year Developed Floor Area</td>
<td>19,290,000</td>
<td>23,400,000</td>
</tr>
<tr>
<td><strong>Cumulative Totals:</strong></td>
<td><strong>23,400,000</strong></td>
<td><strong>27,898,000</strong></td>
</tr>
</tbody>
</table>

E. Project Limitations Based on Traffic Impact. When 4,110,000
square feet of additional Commercial Floor Area have been permitted
in the entire Specific Plan area during Phase I and 1/3 of the
intersections listed in Subsection F below are operating at the
unacceptable Level of Service of E or F, as determined by the
Department of Transportation, then each Project shall be limited to the
Basic Development Rights as set forth in Subsection A of Section 6.

F. Critical Intersections: The following corridor intersections are critical
intersections:

Studio City/ Cahuenga Pass

1. Barham Boulevard and Cahuenga Boulevard
2. 101 Ramps, Regal Place and Cahuenga Boulevard
3. Lankershim Boulevard and Ventura Boulevard
4. Vineland Avenue and Ventura Boulevard
5. Tujunga Avenue and Ventura Boulevard
6. Colfax Avenue and Ventura Boulevard
7. Laurel Canyon Boulevard and Ventura Boulevard
8. Coldwater Canyon Avenue and Ventura Boulevard

Sherman Oaks
9. Woodman Avenue and Ventura Boulevard
10. Beverly Glen Boulevard and Ventura Boulevard
11. Van Nuys Boulevard and Ventura Boulevard
12. Kester Boulevard (east and west jog) and Ventura Boulevard
13. Sepulveda Boulevard and Ventura Boulevard

Encino
14. 101/405 Ramps, Sherman Oaks Avenue and Ventura Boulevard
15. Hayvenhurst Avenue and Ventura Boulevard
16. Balboa Boulevard and Ventura Boulevard
17. White Oak Avenue and Ventura Boulevard

Tarzana
18. Lindley Avenue and Ventura Boulevard
19. Reseda Boulevard and Ventura Boulevard
20. Wilbur Avenue and Ventura Boulevard
21. Vanalden Avenue and Ventura Boulevard
22. Tampa Avenue and Ventura Boulevard
23. Corbin Avenue and Ventura Boulevard

Woodland Hills
24. Winnetka Avenue and Ventura Boulevard
25. Canoga Avenue and Ventura Boulevard
26. DeSoto Avenue and Ventura Boulevard
D. Mitigation of Project-Related Traffic Impacts. Prior to the issuance of a building permit, foundation permit, excavation permit or grading permit for a Project with significant traffic impacts as determined by the Department of Transportation, the Applicant, at his, her or its own expense, shall comply with the following regulations:

1. Physical Transportation Improvements. The Applicant shall implement or otherwise establish suitable guarantees to implement traffic and parking mitigation measures at adjacent intersections and streets, as determined by the Departments of Transportation and City Planning, including those street dedications as may be required.

2. Transportation Demand Management Program. The Applicant shall implement or otherwise establish suitable guarantees to implement a Transportation Demand Management (TDM) Program to reduce Project Trips as determined by the Departments of Transportation and City Planning according to the following requirements:

a. Preliminary TDM Plan. Prior to the issuance of any building permit, demolition permit, excavation permit, foundation permit, grading permit, or sign permit, the Applicant shall submit a preliminary TDM Plan to the Department of Transportation. This Plan shall address the Project's unique characteristics and provide detailed measures to achieve and maintain an Average Vehicle Ridership (AVR) goal of at least 1.5, for all uses, except Shopping Centers and retail businesses, as defined in SCAQMD's Regulations within five years of the issuance of any temporary or permanent certificate of occupancy. The preliminary TDM Plan shall include the following elements:

1. Building and site design to facilitate trip reduction such as convenient loading/unloading for high occupancy vehicles (HOV), on-site transit stops and bicycle rider facilities and preferential parking for car/vanpoolers.

2. Consideration of establishment and participation in a Transportation Management Organization (TMO) that shall develop and implement ridesharing and Transportation Demand Management related activities within the Specific Plan area.

3. Establish a rideshare coordinator and develop methods to provide ridesharing information and services to employees.

4. Trip reduction incentives.

5. Measures to enforce TDM on tenants, such as lease terms and conditions.
recommendation by the Director of Planning and the General Manager of the Department of Transportation.

B. Findings For Use of Fund. The funds collected as Project Impact Assessment Fees can be used for Community-wide or Corridor-wide improvements or services, listed in this section so long as the Director of Planning and the General Manager of the Department of Transportation jointly make the following findings:

1. The improvement or service to be funded will mitigate the cumulative adverse impacts of new development within the Plan area and the PRB has had review and its input was taken into consideration regarding the extent of the improvement and;

2. The improvement or service to be funded does not involve maintenance of existing facilities; and

3. The street improvement or service to be funded is made only to public streets and highways, not to private streets or alleys or state freeways.

4. The funding of transit programs includes only capital expenditures and not operating and maintenance expenditures.

C. Phase I Improvements and Services. The following are the Community-Wide and Corridor-Wide Improvements and Services proposed under Phase I of the Specific Plan program:

1. Transit/TDM/TMO - Local public transit, TDM programs, and TMO programs;

2. Off street Parking - Peripheral parking lots or structures to serve each of the five communities; and

3. Intersection Improvements - Right-of-way acquisition, intersection flaring and signal improvements at nineteen intersections as listed below. The Department of Transportation shall review intersection improvements on a case by case basis, and may do so with the assistance of the PRB:

   Studio City /Cahuenga Pass
   a. Lankershim Boulevard and Ventura Boulevard
   b. Tujunga Avenue and Ventura Boulevard

   Sherman Oaks
   c. Woodman Avenue and Ventura Boulevard
   d. Beverly Glen Boulevard and Ventura Boulevard
   e. Kester Boulevard (West Jog) and Ventura Boulevard
Response to Comment No. 12-372

Appendix Y1 consists of excerpts of the text of the Ventura–Cahuenga Boulevard Corridor Specific Plan and is referenced in Comment No. 12-33. As such, the commenter is referred to Response to Comment No. 12-33, above.

Comment No. 12-373

See next page
January 29, 2011

Jon Foreman – Senior City Planner

Case Number ENV-2007-254-EIR, Clearinghouse Number 2007071036
Project Location: 100 Universal City Plaza, Universal City, CA 91608

The Ventura/Cahuenga Boulevard Corridor Specific Plan Review Board (PRB) is concerned that the NBC Universal Evolution Plan Draft Environmental Impact Report (DEIR) inadequately addresses issues relating to the Ventura/Cahuenga Boulevard Corridor Specific Plan. The proposed DEIR is in violation of the Ventura/Cahuenga Boulevard Corridor Specific Plan (VCBC Specific Plan) as follows:

Sign district 2C (Universal City Southern Entry Point sign) of the proposed Universal City Specific Plan in the DEIR violates the VCBC Specific Plan signage regulations. No exception has been requested. If such an exception is requested in the future, the signage, as proposed, will be opposed by the PRB.

Additionally:

- The DEIR specifies major regional traffic impacts that affect most if not all of the communities along the corridor without offering anything close to adequate mitigations.

- The DEIR suggests significant parking impacts but characterizes them as “less than significant.” The PRB strongly disagrees with that characterization.

Until these issues are specifically addressed, the Ventura/Cahuenga Boulevard Corridor Specific PRB recommends the City and County oppose granting any discretionary approvals. We also recommend that no amendments to the Ventura/Cahuenga Boulevard Corridor Specific Plan be approved.
Approved unanimously* by the Ventura/Cahuenga Boulevard Corridor Specific Plan Review Board on January 13, 2011.

Kathy Delle Donne, President
3rd Council District Appointee

Dennis DiBlase
3rd Council District Appointee

Diane Rosen
5th Council District Appointee

Gerald Silver
5th Council District Appointee

Craig Buck
2nd Council District Appointee

Bryce C. Lowery
4th Council District Appointee

Lisa Sarkin
2nd Council District Appointee

*Art Ginsburg was not present at January 13, 2011 meeting
Response to Comment No. 12-373

Appendix Y2 consists of a copy of a letter from the Ventura–Cahuenga Boulevard Corridor Specific Plan Review Board to the City Planning Department and is referenced in Comment No. 12-33. As such, the commenter is referred to Response to Comment No. 12-33, above.

In addition, the Ventura-Cahuenga Boulevard Corridor Specific Plan Review Board Letter is included as Comment Letter No. 13 to the Final EIR. The commenter is referred to Responses to Comment Nos. 13-1 to 13-6 for response to the letter.

Comment No. 12-374

See next page
The residential area located west of Lankershim Boulevard consists of the City View Lofts, a multi-family residential development located along Lankershim Boulevard, and consisting of single-family homes located north of Valleyheart Drive and west of the City View Lofts. Weddington Park (South) is located south of the residential area. Adverse physical land use impacts are not anticipated as Project development in this area of the Project Site would reflect existing on-site development patterns and would be separated from this area by the approximately 100-foot Lankershim Boulevard roadway. In addition, physical land use connections between the Project Site and the Island residential area are limited due to the intervening four-story City View Lofts as well as Weddington Park (South). Therefore, the proposed Project would not substantially and adversely change the existing physical land use relationships between the Project Site and this area, and would not disrupt, divide, or isolate this residential area. As such the proposed Project would have less than significant physical land use impacts with respect to this area.

(xii) Lakeside Golf Club

Future development along most of the northern Project Site boundary would be similar to existing on-site development in terms of existing land uses (studio and office) and building heights (up to approximately 75 feet). The primary increase in building heights and massing, as compared to existing conditions, would occur within the Mixed-Use Residential Area between the Los Angeles River Flood Control Channel and Lakeside Plaza Drive, where future building heights of 170 to 180 feet could provide a substantial increase above the existing four-story Lakeside Plaza structure. Nonetheless, the Los Angeles River Flood Control Channel would continue to serve to physically separate the Project Site from the Lakeside Golf Club such that, similar to existing conditions, land uses and activities within the northern portion of the Project Site under the proposed Project would not have a substantial adverse physical land use connection with the golf club. Based on this physical separation and because Project development would primarily reflect existing on- and off-site development patterns, the proposed Project would not substantially and adversely change the existing physical land use relationship between the Project Site and the Lakeside Golf Club and would not disrupt, divide, or isolate the existing Lakeside Golf Club. Therefore, the proposed Project would have a less than significant physical land use impact with respect to this private recreational facility.

(xiii) Toluca Estates Residential Area

Although the proposed Project may provide building massing greater than that of the existing homes within Toluca Estates, the Los Angeles River Flood Control Channel would continue to serve to physically separate the proposed Project Site from the southernmost homes in this residential area by a minimum distance of approximately 200 feet. In
Response to Comment No. 12-374

Appendix Z consists of a copy of page 42 from the Draft EIR and is referenced in Comment No. 12-34. As such, the commenter is referred to Response to Comment No. 12-34, above.